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Acknowledgement of Country

We, the authors, respectfully acknowledge the Traditional Owners of the land on which we work and live. We pay our respects to their Elders past and present, and recognise their sovereignty was never ceded.

We also recognise those whose ongoing effort to protect and promote Aboriginal and Torres Strait Islander cultures will leave a lasting legacy for future Elders and leaders.

The bulk of this report was researched and written on the lands of the Bidjigal, Gadigal, and Wangal peoples of the Eora Nation in New South Wales, and the Wadawurrung people of the Kulin Nation in Victoria.

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EXECUTIVE SUMMARY

Over the past two decades, unchecked media concentration in Australia has allowed big media corporations to accumulate vast amounts of wealth, influence, and power — with calamitous consequences for our democracy.

Whilst the state of media diversity in Australia continues to dominate political discussion, a lack of transparency and accountability has hampered any deep analysis of Australia’s media market. A key finding of this report focuses on the failure of corporations, government, and regulatory agencies to report on, or provide access to, clear and transparent data on media consumption and ownership in Australia.

This report aims to rectify that by detailing the concentration of media ownership into the control of just a few private media conglomerates, and unpacks the complexities of the resulting power structures between media ownership, politics, public debate, and democracy in Australia.

This report investigates the impact of media concentration on the ability of everyday people to access and participate in robust democratic debate, and identifies the immediate actions that must be taken if we want to safeguard Australia’s democracy.

It recommends:

- Enhancing the legislative scope and authority of the Australian Communications and Media Authority
- An overhaul of media regulation changes that have effectively entrenched media concentration
- Reintroducing caps on media ownership in geographical markets
- Increasing public investment in news journalism

This report investigates the impact of media concentration on the ability of everyday people to access and participate in robust democratic debate, and identifies the immediate actions that must be taken if we want to safeguard Australia’s democracy.

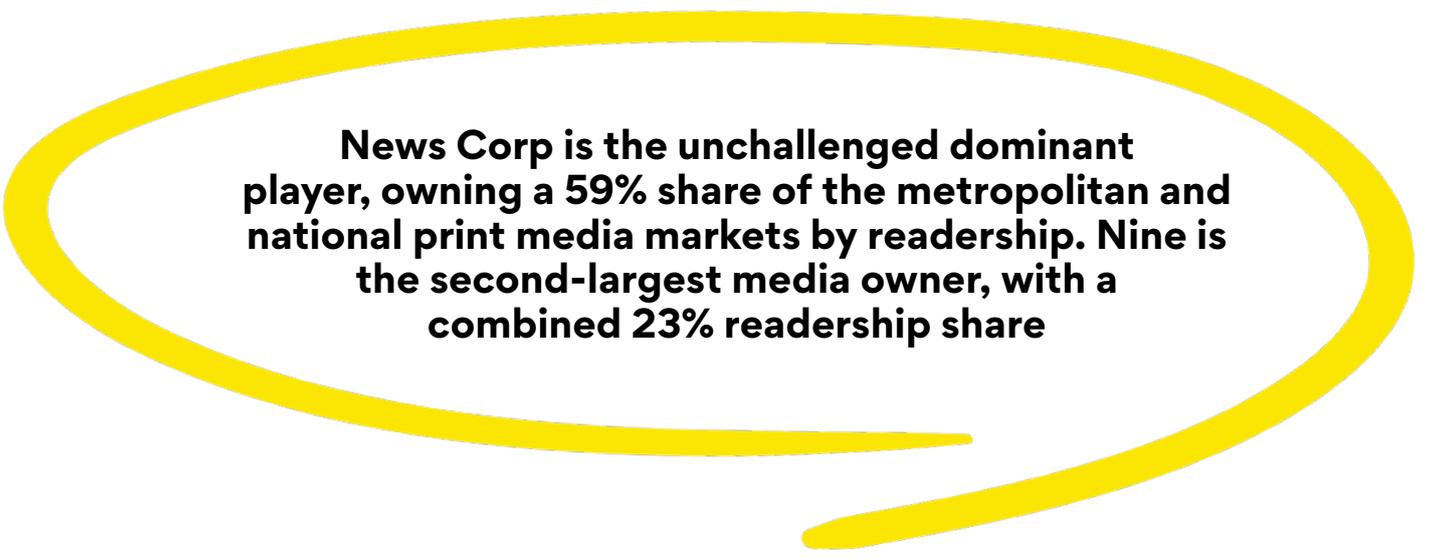
The height of media diversity in Australia was the mid-1920s. Since then, there has been a steep decline in media pluralism.¹ At its peak, 21 independent media owners owned 26 capital city daily newspapers. This diversity of media ownership has diminished to a media monopoly, with just two media corporations controlling Australia's two national mastheads and two daily newspapers in Sydney and Melbourne, the only cities where they compete directly. Each of Australia's remaining capital cities have only one single, unchallenged daily paper, with ownership varied across each city.

News Corporation (News Corp) — controlled by Rupert Murdoch — is the unchallenged dominant player, owning a 59% share of the metropolitan and national print media markets by readership — up from 25% in 1984. Nine Entertainment (Nine) is the second-largest media owner, with a combined 23% readership share.

The dominance of News Corp and Nine's media ownership extends beyond print to other media platforms. Just three corporations — News Corp, Nine, and Southern Cross Media (and their associated entities) — control almost 90% of the lucrative metropolitan radio licences across the country.



News Corp — controlled by Rupert Murdoch — is the unchallenged dominant Australian media player. Photo credit: Shutterstock.



News Corp is the unchallenged dominant player, owning a 59% share of the metropolitan and national print media markets by readership. Nine is the second-largest media owner, with a combined 23% readership share

The predominance of News Corp in cross-media settings is unprecedented in liberal democracies. In addition to its dominance in print readership and radio, it owns Foxtel — Australia’s only subscription broadcasting service in practical terms — reaching an estimated audience of over 5 million people per week.

As a result, News Corp earns 40% of total Australian television revenues — combining free-to-air television advertising and subscriptions — almost double that of second-place holder Nine.

Beyond direct ownership interests, this report notes the extensive content licences and affiliate relationships by which the largest media corporations extend their influence across a range of other media outlets, including across rural and regional Australia. It also shows how these few corporations are extending their dominant positions — from the legacy media services of radio, television, and print, into digital news and on-demand services.

This highly concentrated media ownership has had a corrosive impact on Australia’s democracy. It has skewed public debate, favouring the interests of the wealthy and powerful over the public good. This has been clearly evidenced in the national debates on climate change policy, where the scale of News Corp’s climate misinformation has hindered climate policy, encouraged negative sentiments towards climate action, and actively driven a political wedge into our public debate. This would not have been possible in a more diverse media landscape, where the excessive power of corporations like News Corp is diluted to make way for a media sector that not only holds the government to account, but itself too.

For our democracy to thrive, media concentration by big media corporations and digital technology giants must be reviewed and regulated in line with the best interests of all of us. The role of the media in a democracy is an open and free press that serves the public interest and holds power to account. Yet consistent deregulation is having the opposite effect in Australia — where our digital news environment is just as concentrated as print, radio, and television.

This is why the current inquiry into media diversity and its impact on public interest journalism and democracy is a critical opportunity to enact reform. Reform to ensure unelected individuals in the media cannot exert excessive power on our democracy. Reform to ensure communities — from Kalgoorlie to Bondi — have access to reliable news about their local areas. Reform to ensure we never return to this level of media concentration again.

This report aims to make clear just how bad Australia's media concentration has become, why we allowed it to get this far, and makes key recommendations to ensure a diverse and flourishing media landscape in Australia.



I have two young daughters and I work as a registered nurse and a nurse educator. Murdoch [controlled News Corp] recently purchased the one local newspaper on the Sunshine Coast, The Sunshine Coast Daily. Now Murdoch can provide one side of a story without any competition or opposition. Where we live will be greatly affected by climate change.

There needs to be investment in sustainable infrastructure and honest discussions about wealth inequality and community engagement. Instead, the Murdoch Press consistently shifts the discussion away from all of these topics and drives division and climate denial. This will impact the ability of the Sunshine Coast to adapt effectively to the changing world.”

Sarah – Sunshine Coast, QLD.

KEY REPORT RECOMMENDATIONS

An ACMA with teeth

- The media regulator, the Australian Communications and Media Authority (ACMA), be provided:
 - Enhanced legislative authority that secures independence and its capacity to use its investigatory powers at any time
 - Adequate funding to independently carry out its duties, functions, and responsibilities, including increased monitoring and reporting on the Australian media and communications sector
 - A mandate to conduct periodic plurality reviews and monitor and publicly report on media market status and developments, including detailed information about revenue, expenditure, and ownership of Australian media outlets
 - A mandate to request information from media organisations about ownership, revenue, and shares across platforms
 - A mandate to impose new transparency requirements, including a public register for politicians to document every meeting with media executives and owners during their time in office

Overhauling media ownership laws

- An overhaul of media regulation changes that have effectively entrenched media concentration, including the 2017 repeal of the two out of three rule
- Reintroducing caps on single-media and cross-media ownership in specific geographical markets, with exemptions in exchange for enforceable public service obligations — for example, the delivery of local news

Public investment in news media

- Incentives to encourage alternative models of media ownership, such as cooperatives and nonprofits
- Introducing a new tax rebate scheme and charitable status for news organisations producing public interest journalism
- Direct ongoing press subsidies to support pluralism in local and regional media markets
- Adopting the ACCC's 2019 Digital Inquiry recommendation to impose a levy on big tech companies that can return new funding opportunities for diverse organisations producing public interest news
- Reversing the drastic reductions in public funding to the ABC and SBS

LIST OF ABBREVIATIONS

AAP — Australian Associated Press

ABC — Australian Broadcasting Corporation

ACCC — Australian Competition and Consumer Commission

ACMA — Australian Communications and Media Authority

ARPU — annual revenue per user

BSA — Broadcasting Services Act

CFS — Country Fire Service

DA — development application

FY — financial year

MYEFO — Mid-year Economic and Fiscal Outlook

News Corp — News Corporation

Nine — Nine Entertainment

NSW — New South Wales

OECD — Organisation for Economic Co-operation and Development

QLD — Queensland

SA — South Australia

SBS — Special Broadcasting Service

UK — United Kingdom

UNESCO — United Nations Educational, Scientific and Cultural Organisation

U.S. — United States

WA — Western Australia

INTRODUCTION

On 11 November 2020, the Australian Senate referred an inquiry into the state of media diversity, independence and reliability in Australia. The Senate referred the inquiry after more than 500,000 people signed a petition, created by former Prime Minister Kevin Rudd, that raised concerns about the level of influence wielded by News Corp. The petition was the largest e-petition in Australia’s parliamentary history.²

“Mr Rudd launched his petition on October 10 and asked for a royal commission largely because of his concerns about the influence of newspapers such as News Corp’s *The Australian*, the *Herald Sun* and *The Daily Telegraph* on democracy. Mr Rudd was also concerned about job losses in journalism caused by major cuts in regional and metropolitan newsrooms, the impact of digital platforms such as Google and Facebook on media diversity, and Nine Entertainment Co’s takeover of *The Age* and *The Sydney Morning Herald*. Nine’s takeover took place after media laws were relaxed in 2017.”³

The Senate inquiry was tasked with investigating the state of media diversity, independence, and reliability in Australia and the impact that this has on public interest journalism and democracy.

The petition’s size highlighted growing public frustration at the overt and covert impact of media concentration on democratic decision-making in Australia.

The research findings of this report confirm the biggest losers in a country lacking media diversity are everyday people. It is not just that media concentration restricts and silences minority voices and dissent, or that public discourse becomes controlled by vested interests. It’s much more — leaving the media in the hands of a powerful few allows those few to direct public policy, shape media regulation, and erode the principles of Australian democracy.

**The biggest losers in a country
lacking media diversity are everyday people.**

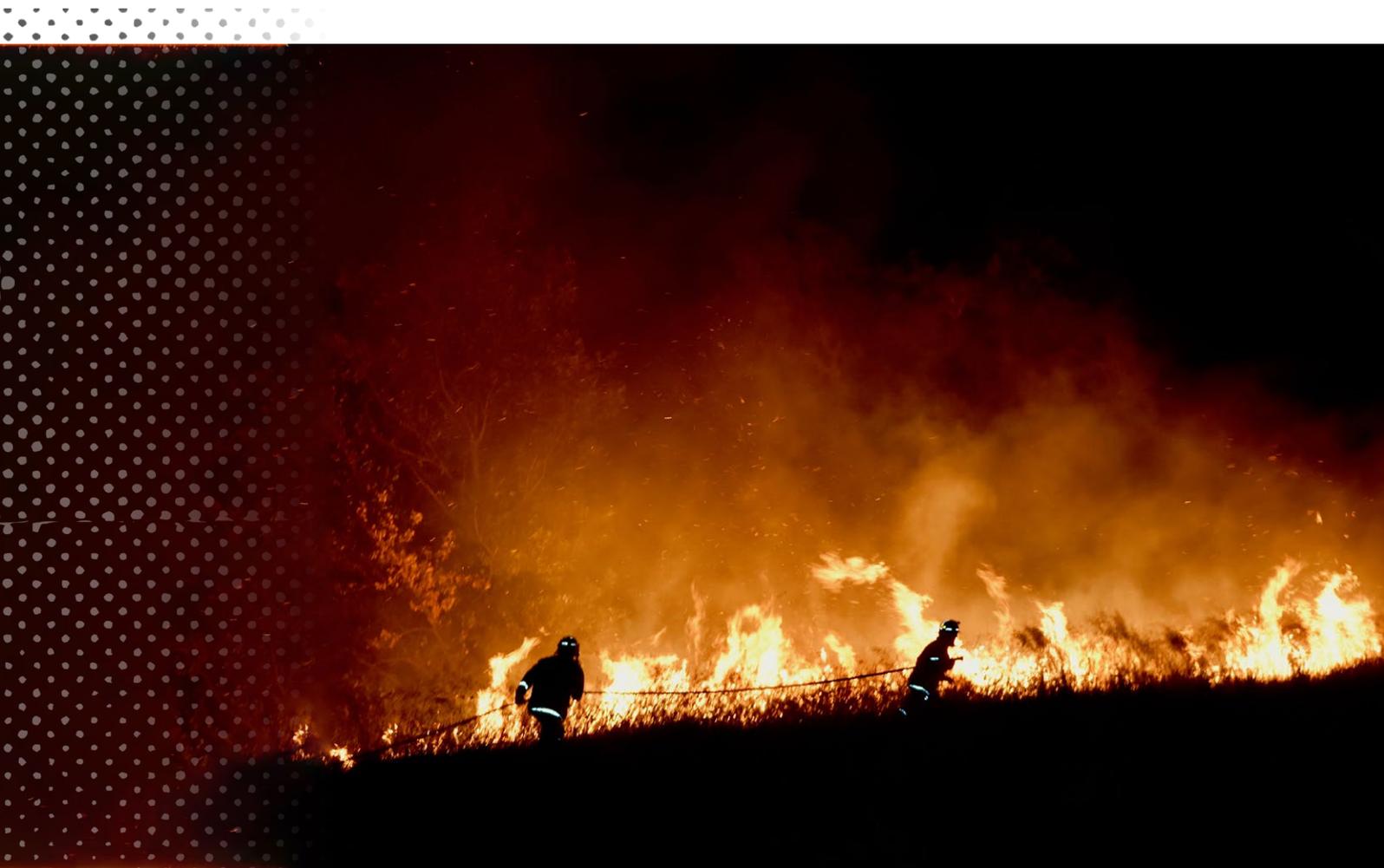


2 Snape, J. ‘Petition calling for media royal commission and setting Australian record tabled in Parliament’. *ABC News*. (9 November 2020).

3 Samios, Z. ‘Senate to launch media diversity inquiry after Kevin Rudd petition’. *Sydney Morning Herald*. (11 November 2020).

Media concentration and global crises: climate change, COVID-19, and racism

Public and political engagement with the question of media ownership and concentration in Australia has been renewed in recent years, sparked by increased public awareness and outrage at the excessive power of News Corp. The 2019/20 summer bushfires fuelled a wave of public anger and frustration at the disinformation published in the Murdoch-controlled press. Dismissal of the link between climate change and the disastrous fires led to extensive criticism of News Corp, including international coverage from *The New York Times* reporting on “How Rupert Murdoch is Influencing Australia’s Bushfire Debate”⁴ and *Al Jazeera* reporting on “How ‘Murdochracy’ controls the climate debate in Australia”.⁵



Dismissal of the link between climate change and the disastrous fires led to extensive criticism of News Corp. Photo credit: Shutterstock.

4 Cave, D. ‘How Rupert Murdoch Is Influencing Australia’s Bushfire Debate’. *The New York Times*. (13 January 2020).

5 Walton, K. ‘How “Murdochracy” controls the climate debate in Australia’. *Al Jazeera*. (24 January 2020).



We live on Kangaroo Island, SA and have one local paper, The Islander, which has been drastically reduced over the past 10 years. The independence and relevance of local newspapers supports the social fabric of the community. As an island, offshore reporting is completely inadequate for us — local papers tell local stories. From advertising events — community meetings, social activities — to reporting on issues important to smaller communities, like council decisions. During the 2020 bushfires, our local paper editor did a fantastic job, almost 24/7 putting out stories. It was essential back-up to ABC and CFS [Country Fire Service] information. But more than that it showed the human side — the paper followed-up after the fires, with positive stories and informing the community of the progress. This is the very stuff that knits our community together. It is irreplaceable. It's sad to see the domination of the state and national media landscape by the Murdoch press. With so much media — television, newspapers, radio — focused on the eastern states, local independent news is more important than ever.”

Bev – Kangaroo Island, SA.

The 2020 report *Lies, Debates, and Silences: How News Corp produces climate scepticism in Australia*⁶ analysed 8,612 pieces of news, opinion, editorials and letters mentioning climate change across four News Corp publications — *The Daily Telegraph*, *Herald Sun*, *Courier Mail*, and *The Australian* — between April 2019 and March 2020, covering the worst bushfire season on record and the massive School Strike 4 Climate protests.

It found that 45% of all News Corp climate coverage expressed scepticism in the reality of climate change. 65% of opinion pieces were sceptical towards climate science. Of the 55% of stories that accepted climate science, there was negligible reporting of the findings of climate scientists or the impacts of climate change.

“News Corp claims to promote debate about climate change, but what we found is that rather than engage with the issues, News Corp silences and abuses scientists and those advocating for policy change, and mobilises readers against effective action to reduce carbon emissions.” — Former Professor of Journalism at University of Technology Sydney and report co-author Wendy Bacon.⁷

Meanwhile, as governments around the world struggled to respond to the COVID-19 pandemic, fierce coordinated campaigns were launched on the pages and screens of News Corp — in Australia and abroad — to protect “personal liberty” against public health measures to curb the virus’ spread. *The Australian*’s economics editor, Adam Creighton, consistently argued for governments to prematurely lift lockdowns on economic grounds, calling public health measures “health fascism”.⁸ Creighton and other News Corp commentators, such as *Sky News* host Alan Jones, routinely disputed the expertise of epidemiologists and public health experts⁹ and spread misleading and unproven theories on how to respond to COVID-19, such as “herd immunity”.¹⁰ Creighton even suggested that lockdowns, rather than COVID-19 itself, were to blame for the enormous rate of excess deaths in the U.S. during 2020.¹¹

6 Bacon, W. & Jegan, A. *Lies, Debates, and Silences: How News Corp produces climate scepticism in Australia*. (2020)

7 GetUp. ‘New research reveals massive scale of News Corp climate scepticism’. *GetUp*. (17 December 2020)

8 Creighton, A. ‘Personal liberty sacrificed at the altar of COVID public safety’. *The Australian*. (19 December 2020).

9 Gillespie, E. ‘Alan Jones praises Sweden’s COVID-19 response as a success despite high death rate’. *The Feed*. (20 August 2020).

10 Sky News. ‘The world has moved into a ‘period of collective psychosis’ over COVID’. *Sky News*. (8 December 2020).

11 Creighton, A. ‘Personal liberty sacrificed at the altar of COVID public safety’. *The Australian*. (19 December 2020).



Former Prime Minister Kevin Rudd appears before a Senate inquiry into Media diversity in Australia at Parliament House in Canberra, Friday, February 19, 2021. Photo credit: AAP Image/Mick Tsikas.

In Victoria, this campaign reached vicious levels. Despite broad public support for Premier Daniel Andrews, News Corp labelled him ‘Dictator Dan’ and called for his removal. In September 2020, Sky News published the headline “‘Dictator Dan’¹² is trying to build a ‘COVID gulag’”.¹³ Sky News host and former Liberal government adviser Peta Credlin equated Andrews’ high levels of public support with “Stockholm syndrome”.¹⁴

In addition, a rise in COVID-related racial hostility directed at Asian Australians was compounded and fuelled by racist reporting in the Australian media, particularly by

the Murdoch-controlled press¹⁵. In January 2020, News Corp newspapers the *Herald Sun* and *The Daily Telegraph* published front-page headlines including phrases ‘CHINA VIRUS’, ‘PANDAMONIUM’ and ‘CHINA KIDS STAY HOME’.¹⁶ An online petition organised by Australian Chinese communities, demanding the newspapers apologise, gathered over 90,000 signatures.¹⁷ In June and July, articles by prominent *Herald Sun* columnist Andrew Bolt carried headlines reading ‘VICTORIA’S CORONAVIRUS CRISIS: MADE BY MULTICULTURALISM’ and ‘VIRUS THRIVES IN MULTICULTURALISM’.¹⁸ One of the articles claimed that “multiculturalism has made Victoria more vulnerable”.¹⁹

12 Gillespie, E. ‘News Corp slammed for “unbalanced” reporting on Victorian premier as poll shows majority supports him’. *The Feed*. (22 September 2020).

13 Angus, D., Bruns, A., Graham, T., Hames, S. & Hurcombe, E., ‘#IStandWithDan, #DictatorDan, #DanLiedPeopleDied: 397,000 tweets reveal the culprits behind a dangerously polarised debate’. *The Conversation*. (22 December 2020).

14 Sky News. ‘High polls for Andrews clearly equate to ‘Stockholm syndrome’’. *Sky News*. (22 September 2020).

15 Smee, B & Meade, A. ‘Naming Brisbane women risks ‘a second wave of COVID-related racial hostility’: commission’. *The Guardian*. (30 July 2020).

16 Blackiston, H. ‘Criticism over ‘downright offensive and unacceptable race discrimination’ in News Corp Coronavirus headlines’. *Mumbrella*. (31 January 2020).

17 Wong, W. ‘Strongly require the apologies from Herald Sun and Daily Telegraph’. *change.org*. (2020).

18 Herald Sun. ‘Press Council adjudication’. *Herald Sun*. (24 February 2021).

19 Bolt, A. ‘Andrew Bolt: Multiculturalism made Victoria vulnerable to coronavirus’. *Herald Sun*. (12 July 2020).



The end of JobKeeper saw our local paper, The Bellingen Shire Courier Sun, shut its doors completely after 132 years. The local paper was part of the glue that kept us connected. Not everyone is online, but everyone used to get the weekly paper — it was how you found out what was happening across different sections of the community. It wasn't just which sporting team had won or who had passed away — although that is important in country towns — but also local initiatives, community groups needing or offering a hand, local stories, and a chance to understand what council and government reps were doing.

Letters to the Editor, in particular, were a key forum for community discussions and the sharing of different perspectives. The paper provided a base for conversations over the fence, in the shops, and at the school gates.

As a community group working to engage people across the community, the paper was a vital platform. The council was required to list a range of DAs [development applications] and other activities in the local paper, but that requirement is gone now. People are much less likely to actively seek out that information on a council website than they are to see it as a public notice in a free paper — so we're losing another important opportunity for people to be informed and involved in civic engagement.

Social media is an echo chamber and while useful in some ways, it also doesn't include many in our local community. We are weaker as a community without our local voice.”

Emma – Bellingen Shire, NSW.

A 2020 report co-authored by the Asian Australian Alliance, Being Asian Australian, and Per Capita research fellow Osmond Chiu found that “racist attacks are further fuelled by negative media coverage of Asians in Australia” and that “the media has been complicit in spreading anti-Chinese sentiments with sensationalist headlines, racially charged imagery, and one-sided reporting around the issues concerning the pandemic and the growing influence of China”.²⁰ A 2017 study of racist reporting in the Australian media found “negative race-related reports were most commonly published in News Corp publications”.²¹

These factors led to a renewed awareness of the power and influence wielded by a small number of media companies in Australia, and a renewed desire to try and change a media system that does not act in the public interest.

Current challenges and opportunities

The recently legislated News Media Bargaining Code has shone a light on the power imbalances between Big Tech and large media companies on one hand, and smaller media companies on the other. Without the bargaining power to secure profitable deals with Big Tech companies, smaller publishers have been excluded from reaping any benefit from the Code. As a result, it has ensured media concentration in Australia only increases as traditional media monopolies out-negotiate small publishers.

The media diversity inquiry offers a crucial policy moment for Australia to reflect on the state of the media and its performance, and offers opportunity for bold reform.

A challenge to informing this debate is the lack of media transparency on the ownership of Australia’s media institutions. This report looks to provide context to the importance of media ownership, unpack the complexities of these power structures in Australia and highlight the impacts of media concentration on the Australian public sphere and democracy.

As the resolution 1994 of the Council of Europe declares, “media transparency is necessary to enable members of the public to form an opinion on the value which they should give to the information, ideas, and opinions disseminated by the media”.²²

This dominance is particularly significant considering the role played by national and metropolitan newspapers in the Australian media landscape. Dominance in different media markets is not equal. The shrinking of local and regional media offerings over the past decade has increased the power of national and metropolitan newspapers — the ownership of which is concentrated in the hands of a powerful few, while the growth of unchecked political influence over the national debate reaches far into our regional, localised news coverage through cross-market media deals.

20 Chiu, O. ‘COVID-19 Coronavirus Racism Incident Report: Reporting Racism Against Asians in Australia Arising due to the COVID-19 Coronavirus Pandemic.’ *Asian Australian Alliance*. (2021).

21 Ho, C. ‘Racist reporting still rife in Australian media.’ *The Conversation*. (15 December 2017).

22 Council of Europe. ‘Recommendation No. R (94) 13 of the Committee of Ministers to Member States on Measures to Promote Media Transparency.’ *Council of Europe*. (1994), p 1.

The information in this report tells the story of how a shrinking media landscape is damaging our democracy, and makes a compelling case for widespread reform to ensure media that guarantees — not undermines — our democracy

This report provides contextual and comparative information about why media ownership matters and its relevance for our democracy. It delves into the complexities of media ownership structures that impact on the Australian public sphere and investigates data on readership shares, revenues, and power to paint a clear picture of who owns the Australian media, and how media ownership disproportionately sets the public agenda. Lastly, it provides a set of clear recommendations for media reform.

METHODOLOGY

This report offers a comparative analysis of trends and market developments within Australia’s media sector, along with an extensive overview of media diversity in Australia.

A methodological approach was adopted that employs a triangulation of document analysis with secondary research.²³ Document analysis has been widely used in the discipline of media policy studies and political economy of communication studies,²⁴ the academic research fields in which this study is situated. The process of collecting documents began by identifying the main institutions involved in shaping the Australian media market, with a focus on the years since 2012.

Data collection and analysis was conducted in four phases:

1. An extensive consultation of background material, including previous academic research, media, and political commentary, and policy documents
2. The development of the research design and identification of relevant document types and sources
3. Accessing, collecting, and sampling the documents
4. Conducting a political economic analysis of the data

As a result of the challenges faced by the researchers concerning the availability of transparent and clear data — from corporations, government, and regulatory agencies — on media consumption and ownership in Australia, this report examines a range of publicly available data on media audiences, (including readership, audience share, and circulation) revenue, outlets, platforms, and media corporations. Data was drawn from academic research, industry and regulator reports, public reviews, and financial and investor reports. See Appendix 1 for a comprehensive list of data sources.

This report uses measurements of revenue, readership, circulation, and audience to calculate and analyse media diversity in Australia. These measurements can be defined as follows:

- *Revenue* — income gained from the activities and operations of an organisation (also see notes to tables and graphs)
- *Readership* — the estimate of the average number of readers for a print publication, either the number of people or a percentage of the total number of Australians who read the publication in a period of 12 months (also see notes to tables and graphs)

23 Brevini, B. ‘Australia swims against the tide of democratic media reform’. *The Conversation*. (18 March 2014).

24 See for example: Humphreys, P. *Media and Media Policy in Germany: The Press and Broadcasting since 1945*. (1994); Levy, D. *Europe’s Digital Revolution: Broadcasting Regulation, the EU and the Nation State*. (1999); Lindolf, T.R. *Qualitative communication research methods*. (1995).

- *Online reach* — this measurement includes time spent online on various devices viewing the digital version of news media content. A range of methods — for example, the average time spent on a device or site, viewing specific content — are used by measurement organisations (also see notes to tables and graphs). Note that the data from Nielsen reports relates specifically to media and audience habits
- *Circulation* — the number of print copies distributed of a publication
- *Audience* — a specific radio and television measurement includes audience share and reach figures. Share refers to the average number of people watching or listening to a specific program or during a specific period, expressed as a percentage of total people watching or listening television or radio at that time
- *Roy Morgan Research Australian Readership Results* — over 2012, 2018, and 2020
- *EMMA (Enhanced Media Metrics Australia) Readership Data* — surveys of newspaper and multi-platform brands
- *GfK* — radio data from surveys of metropolitan audience ratings and average audience (also see notes to tables and graphs)
- *OzTam* — television data from surveys measuring metropolitan television share (also see notes to tables and graphs)
- *RegTam (Regional Television Audience Measurement)* — refers to television data from surveys of regional television share (also see notes to tables and graphs)

Data analysed in this report covers the last decade, with a particular focus on the years 2012, 2018, and 2020, when Australia’s media sector experienced significant change. 2012 was the last year we had available data on media concentration in Australia, 2018 the year after the latest round of significant deregulation, and 2020 as the latest data available at the time of writing.

From the end of 2017, major news organisations in Australia started withdrawing their voluntary provision of circulation data. News Corp was the first to leave the Audit Bureau of Circulations in late 2017, followed by Fairfax the next year. To compensate for this lack of transparency, this report uses readership measurements from 2012, so to provide a clear longitudinal understanding up to 2020. The report also analysed all financial reports by the major publishers that still show circulation revenues, in order to show the concentration in terms of revenues.



A lack of media transparency

It is important to note the significant methodological challenges faced by any researcher examining or conducting analysis on Australia's media sector. Our media sector is plagued by a systemic lack of transparency and public accountability. It is extremely difficult to access critical information about who owns and controls the media. **A key finding of this report focuses on the failure of corporations, government, and regulatory agencies to report on, or provide access to, clear and transparent data on media consumption and ownership in Australia.** This critical lack of transparency means it is extremely difficult to hold the owners of media corporations — who wield enormous amounts of power in our society — to account for their actions.

MEDIA OWNERSHIP AND DEMOCRACY

Snapshot of key findings

- Concentration of media ownership in Australia has become a dangerous problem for the integrity of Australia's news reportage and a risk to democracy
- Media concentration places excessive political and ideological power in the hands of a few, giving them the ability to set the public agenda, determine political decision-making, public policy, and media policy
- Media concentration results in a clear decline in the quality of journalism — investigative or otherwise — along with restrictions on editorial freedom and an erosion in the quality of working conditions and job security for journalists
- Between 2008 and 2018, 106 local and regional newspaper titles closed their doors, a 15% decrease in the total number of Australian newsrooms
- At least 5,200 Australian journalism jobs have been cut between 2012 and 2020
- Alongside a decrease in local and regional news, there has been a significant reduction in the number of articles covering local government issues, public health and science over the past 15 years

How media ownership impacts democracy

A thriving, independent, and diverse media sector is essential for a healthy democracy. Media plays a vital role in providing communities with access to trustworthy and accurate information and in holding power to account. The media sector remains the principal arena in which public-interest issues are debated and where different political interests compete for visibility, credibility, and legitimacy.

However, over the past two decades, unchecked media concentration in Australia has allowed big media corporations to accumulate vast amounts of wealth, influence, and power with negative consequences for our democracy.

Media concentration can be defined as the process by which a small number of individuals and organisations gradually gain control of the shares of a specific media market (both revenues and audiences) in a country. In economic terms, media



Rupert Murdoch's News Corp was central to the investigation into phone hacking and corruption. Photo credit: Stefan Rousseau/PA Wire.

concentration results in excessive market power that distorts competition and generates structural inequalities — dominant institutions force all other smaller market competitors to operate on their terms. Media concentration results in excessive political and ideological power being held in the hands of a few.

Media corporations' attack on 'news'

The news is one of our most important public goods — it is fundamental to the health of our society. It provides crucial tools and platforms for the informed and robust debates that enable our democratic processes to thrive. But this important understanding of the role of news as a public good is under attack by a few powerful media moguls.

An increasingly dangerous interpretation of what news represents is heavily promoted by billionaire media moguls like Rupert Murdoch, who measure the worth of news not by its invaluable contributions to the health of our democracy, but by its monetary worth, articulating it as “the most valuable commodity in the world”.²⁵

News — here interpreted as public-interest news²⁶ — should never be considered as an ordinary commodity, valuable or otherwise. In a recent inquiry, the Australian Competition and Consumer Commission (ACCC) explicitly recognised the benefits of public-interest journalism as “an important contributor to the ‘public sphere’, democracy, and the economy,” and confirmed that it “has a place within much broader constructs of societal communication and debate”.²⁷

25 Benton, J. ‘Rupert Murdoch on splitting News Corp: News is “the most valuable commodity in the world”’. NiemanLab. (28 June 2012).

26 This report refers to news as “public interest news”, following the underpinnings and remit of the Select Committee on the Future of Public Interest Journalism, 2018.

22 27 ACCC. ‘Digital Platforms Inquiry: Final Report.’ ACCC. (June 2019), p 284.

However, in order for public-interest journalism to exert this crucial democratic function, journalists need the freedom and the resources to carry out their work. As Natalie Fenton warns us:

“(Press) freedom in this context does not simply mean freedom from censorship and interference from government so frequently associated with the term ‘freedom of the press’; it also means freedom from the constraints and limitations of a thoroughly corporate culture. In neo-liberal democracies the power of the market is just as significant as the power of government.”²⁸

Despite the dominance of policy rhetoric around the importance of media diversity in global governance debates, policy decisions and actions from Europe, the U.S. and Australia have favoured the interests of corporate ownership over that of public interest. Since the 1980s, we can trace a common trend toward growing media consolidation and deregulation of ownership regimes.²⁹ Australia’s media systems³⁰ today are the product of four decades of deregulation designed to serve the interests of powerful corporate media, with the relaxation of government regulation often justified by technological developments. Together, these factors have led to a highly concentrated media market, with massive slashes to journalism jobs and newsrooms, and fewer financial resources made available for public interest journalism.

What’s this got to do with democracy?

Excessive concentration of media ownership threatens media plurality — a vital pillar of a healthy democracy — by limiting opportunities for diverse views and perspectives, and concentrating power in the hands of a few. The core principle at play here is that in order for citizens to actively participate in public debate, it is crucial to guarantee media diversity and to make space for as many voices as possible.³¹ The increased concentration of media ownership by a powerful few has dangerous implications for the health of our democracy, due to the potential and real editorialisation of the forums for public, robust discussion.

Principles of media diversity and pluralism have been a central component of statements on democracy for decades, including those developed and promoted by the United Nations, the Council of Europe, the United Nations Educational, Scientific and Cultural Organisation (UNESCO), and the Organisation for Economic

28 Fenton, N. ‘Murdochgate and the News: we need to reframe media and the public interest’. *Open Democracy*. (10 July 2011).

29 Barnett, S. ‘Journalism, Democracy and the Public Interest: rethinking media pluralism for the Digital Age’. *Reuters Institute for the Study of Journalism*. (2009); Barnett, S. ‘What’s wrong with media monopolies? A lesson from history and a new approach to media ownership policy’. *London School of Economics*. (2010).

30 A media system is the set of frameworks and arrangements that shape the media and the political arenas of a country.

31 Baker, E. *Media Concentration and Democracy: Why Ownership Matters*. (2007), p 7.

Co-operation and Development (OECD). One of the most comprehensive of such declarations comes from the European Commission’s High Level Group on Media Freedom and Pluralism. It states that:

“Democracy requires a well-informed, inclusive, and pluralistic public sphere; the media are, to a large extent, the creators as well as the ‘editors’ of this public sphere. In this they become the holders of considerable power and may come to assume the status of a ‘fourth estate’ within society. At the same time, the public service aspect and democratic function of media can come under threat either through political interference, undue commercial influence, or increasing social disinterest and indifference on the part of the general public.”³²

A number of inquiries in Australia — including the 2012 Report of the Independent Inquiry Into Media and Media Regulation (or “the Finkelstein Inquiry”) — and the more recent Public Interest Journalism Inquiry, have investigated how a concentrated number of news sources and a lack of diverse voices within the media sector threaten the health of our democracy.

How media concentration threatens democracy

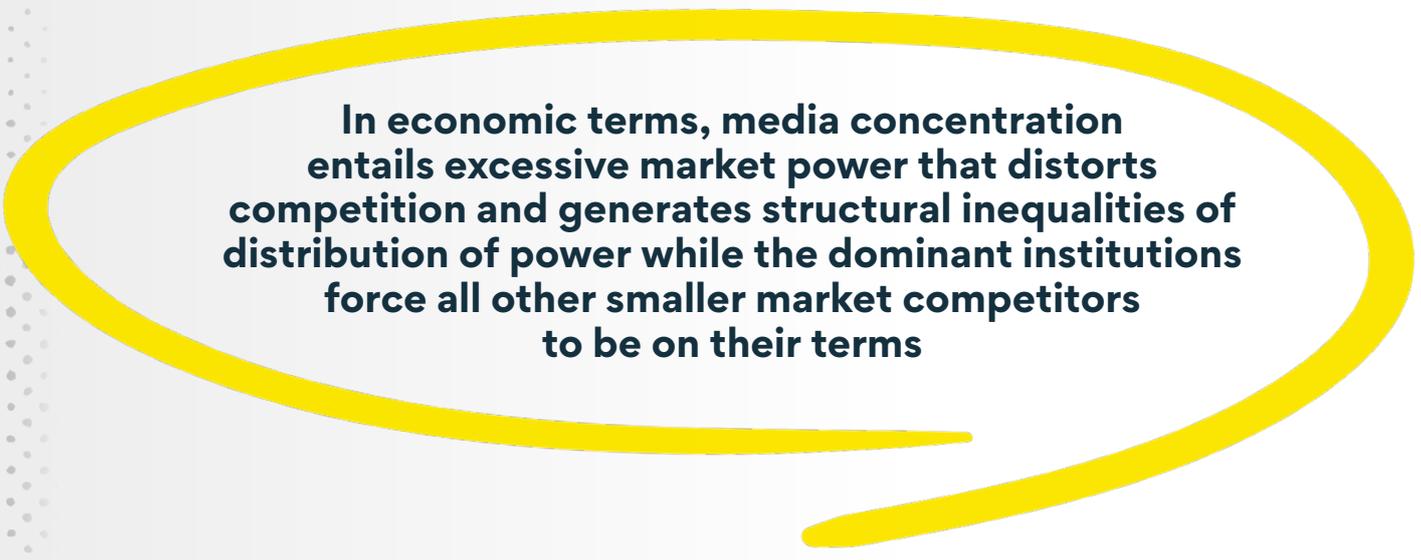
In order for citizens to actively participate in public discourse, it is crucial to guarantee dispersal of power and as many voices as possible. Excessive concentration of media ownership threatens media plurality as a vital pillar of a healthy democracy. Edwin Baker succinctly summarised this core idea in his democratic distributing principle for communicative power, in which he states that the “basic standard for democracy would then be a very wide and fair dispersal of power and ubiquitous opportunities to present preferences, views, visions”.³³ The principle is that in order for citizens to actively participate in public discourse, it is crucial to guarantee dispersal of power and as many voices as possible. Excessive concentration of media ownership threatens media plurality as a vital pillar of a healthy democracy.

Media concentration can be defined as:

The process by which gradually fewer individuals and organisations control the market shares of a specific media market (both revenues and audiences) in a country with detrimental effects for the democratic processes of that country.

In economic terms, media concentration entails excessive market power that distorts competition and generates structural inequalities of distribution of power while the dominant institutions force all other smaller market competitors to be on their terms.

32 High Level Group on Media Freedom and Pluralism. ‘A free and pluralistic media to sustain European democracy’. *European Commission*. (January 2013), p 10.



In economic terms, media concentration entails excessive market power that distorts competition and generates structural inequalities of distribution of power while the dominant institutions force all other smaller market competitors to be on their terms

Media concentration places excessive political and ideological power in the hands of a few, giving them the ability to set the public agenda, determine political decision making, public policy, and media policy.

Core to the idea that media concentration is a threat to our democracy is how economic dominance by media organisations translates into political power. Both through ownership and the ability to control the content of vast networks, and through revenue, which is fuelled by the ability to own these massive networks.

The ability to aggregate major streams of revenue is both a benefit and key driver of media ownership concentration.

Australia's existing national and metropolitan media markets allow for an incredible concentration of economic and political power for a few dominant media corporations.

The concentration of economic power is a core feature of the concentration of media ownership. Economic power enables the expansion of media outlets to aggregate into other media markets — through ownership and through licensing agreements — increasing revenue.

Media concentration results in very specific threats and consequences for our democracy. These include:

- Excessive influence of media owners and advertising clients on the interests and priorities of the government's agenda, and the covert manipulation of political decisions in favour of hidden economic interests
- A diminished sense of *public responsibility* in media institutions
- A clear decline in the quality of journalism — investigative or otherwise — along with restrictions on editorial freedom and an erosion in the quality of working conditions and job security for journalists
- A lack of diversity in the views and stories that are broadcast in the media
- A decline in standards because of the absence of effective competition
- A profound lack of transparency around media ownership and funding sources.
- Potential conflicts of interest arising from journalists' closeness to business interests
- The ability of local communities to access news, information, and a diversity of voices on important issues is limited, which has a detrimental impact on democratic participation

Learnings from the Leveson Inquiry

The Leveson Inquiry was a judicial public inquiry into the culture, practices and ethics of the British press following the News International phone hacking scandal, chaired by Lord Justice Leveson. A series of public hearings were held throughout 2011 and 2012. The Leveson Inquiry offers one of the most striking case studies of how excessive media concentration leads to excessive power and the direct interference by media owners in policy making, including media policy. At the time of the 2012 judicial inquiry, the corporation at the heart of the scandal — the Murdoch-owned News Corp — controlled almost 30% of the United Kingdom's newspaper market.³⁴ The inquiry's report offers hundreds of examples of a political class acting in deference to Rupert Murdoch's News Corp. Former British Prime Minister John Major stated:

“In the run up to the 1997 general election in my third and last meeting with him [Rupert] on 2 February 1997, he made it clear that he disliked my European policies which he wished me to change. If not, his papers could not and would not support the Conservative Government.”³⁵

As the Leveson Inquiry was taking place, then UK Prime Minister David Cameron admitted on the floor of Parliament that, “hand on heart, we all did a bit too much cosyng up to Rupert Murdoch”.³⁶

The Leveson Inquiry demonstrated both the excessive power of media executives over elected members of parliament, the questionable ethical responsibilities of media corporations, and the subsequent reduction of public faith in the integrity of media institutions. Natalie Fenton, Professor of Communications at Goldsmiths College, University of London, states:

“Markets do not have democratic intent at their core. When markets fail or come under threat, or simply become too bullish, ethical journalistic practice is swept aside in pursuit of competitive and financial gain.”³⁷

Linked to the erosion of democratic freedoms is the adverse effect that media concentration can also have on the breadth and depth of journalism coverage. In a concentrated market with reduced competition, the few dominant players have less incentive to safeguard the quality of their content as they have a diminished risk of losing market share. This situation is compounded by the reduced capacity of public interest media organisations to maintain an adequate journalism workforce.



Britain's most senior policeman ordered an inquiry into claims that journalists from the tabloid owned by media mogul Rupert Murdoch illegally hacked into the mobile phones of hundreds of celebrities and politicians. Photo credit: AP Image/Matt Dunham.

35 Lord Justice Leveson. *Leveson Inquiry: Report into the Culture, Practices and Ethics of the Press*. (29 November 2012), p 1131.

36 Clegg, N. 'Liberal Democrats' ties with Murdoch aides revealed to Leveson inquiry'. *The Guardian*. (27 May 2012).

37 Fenton, N. 'Telling Tales: Press, Politics, Power, and the Public Interest'. *Television & New Media*, 13(1) (2012).

A dangerous situation: media monopolies in Australia

Concentration of media ownership in Australia has become a dangerous problem for the integrity of Australia's news reportage and a risk to democracy.

Between 2008 and 2018, 106 local and regional newspaper titles closed their doors, a 15% decrease in the total number of Australian newsrooms.³⁸ Approximately 3,000-3,200 journalism jobs were lost in Australia between 2012 and late-2017,³⁹ with this being further compounded by the loss of over 2,000 newsroom and related media roles in 2020 alone.⁴⁰ In 2019, an analysis of articles published in all metropolitan and national daily newspapers by the three largest Australian news publisher groups over the past 15 years found a significant reduction in the number of articles covering local government issues, as well as coverage of public health and science.⁴¹

It has been argued that journalism's business model has failed to adjust to the digital environment. This represents only part of the problem. The crisis facing the Australian media landscape is the concentration of power of a few profit-driven media corporations and continuous cuts to public service media.⁴²

The role of public service broadcasters in a democracy

Public service broadcasting is essential to the health of Australian democracy. Public service broadcasting is based on the principle that a vibrant democracy requires access to media with a legislated responsibility to put public interest above all else, including commercial, political, and industry needs.

Public service broadcasters create a 'public square' for the community they serve, providing a platform for all citizens to share information, engage in robust debate, learn about each other, and access essential, impartial information about local, national, and global affairs. Underpinning the value of public service broadcasting is the conviction that media diversity and democratic participation in the public sphere cannot be fully secured by commercial media.

Traditionally, public service broadcasters have been required to fulfil public interest obligations such as universal coverage, diversity, and quality of programming, an emphasis on local and national content, and a commitment to impartial standards of news coverage.

38 ACCC. 'Digital Platforms Inquiry: Final Report'. ACCC. (June 2019).

39 Australian Senate. 'Report of the Senate Select Committee on the Future of Public Interest Journalism'. *Parliament of Australia*. (2018), p 29.

40 Warren, C. '2020 was a record year for journo job losses. What comes next?'. *Crikey*. (15 December 2020).

41 ACCC. 'Digital Platforms Inquiry: Final Report'. ACCC. (June 2019).

42 Brevini, B. *Public service broadcasting online: A comparative European policy study of PSB*. (2013); Brevini, B. *Amazon, Understanding a Global Communication Giant*. (2021).

Underpinning the value of public service broadcasting is the conviction that media diversity and democratic participation in the public sphere cannot be fully secured by commercial media



While public broadcasting is key to ensuring a diverse media, the Australian Government has cut enormous amounts of funding from Australia's two public service broadcasters — the Australian Broadcasting Corporation (ABC) and the Special Broadcasting Service (SBS) — severely restricting their ability to fulfil their mandates. The ABC has had over \$600 million removed from its funding over seven years. According to the forecasts in the most recent budget papers,⁴³ the ABC will have had accumulated budget reductions of just over \$1 billion by 2023/24. SBS has also had its budget cut, most significantly in 2015 when it was subject to a \$53.7 million cut over 5 years.⁴⁴



Public service broadcasting is essential to the health of Australia's democracy, but the Australian Government has cut huge amounts of funding from the ABC and SBS. Photo credit: Shutterstock.

43 Department of Infrastructure, Transport, Regional Development and Communications. 'Portfolio Budget Statements 2020-21: Australian Broadcasting Corporation'. *Australian Government*. (2021).

44 'SBS welcomes and supports the Communications Legislation Amendment (SBS Advertising Flexibility and Other Measures) Bill 2015'. *SBS*. (25 March 2015).



“Living in SA, we have been left with little local news content. Our print news at every level is from the Murdoch Press — The Advertiser, The Sunday Mail, and The Australian (which is very eastern state-centric). Even our local paper — The Messenger — was Murdoch press-owned. But it has been discontinued so we even lack this as a connection with our local council community. Now we only receive a monthly newsletter from the council — but this isn’t journalism! It’s missing the stories — about what is happening in our community, what people are doing and achieving. We need local journalists to hold our council and businesses to account. All of this has been exacerbated by the loss of local SA content on the ABC and SBS news due to government funding cuts.”

Judi – Adelaide, SA.

Figure 1 – Australian public broadcasting media.

Platform: free-to-air television	Ownership/legislation	Revenue source	Revenue (2020-21)
Australian Broadcasting Corporation	Public (Australian Broadcasting Corporation Act, 1983)	Public funding	\$1,116 million
Special Broadcasting Service	Public (Special Broadcasting Service Act, 1991)	Public funding / Advertising	\$414 million

Source: Portfolio Budget Statements (2020-21)⁴⁵

*Parliamentary appropriation includes Transmission funding and SBS Advertising revenue.

Figure 2 – ABC funding cuts 2014-24.

Budget change	2014 -15	2015 -16	2016 -17	2017 -18	2018 -19	2019 -20	2020 -21	2021 -22	2022 -23	2023 -24
	\$ million									
1% reduction (May 2014)	9	9	9	9	9	9	9	9	9	9
Cross-portfolio (May 2014)	0	1	1	1						
Efficiency savings (MYEFO, Nov 2014)	0	20	48	55	68	53	54	55	55	55
Indexation freeze (May 2018)						15	28	41		
Tied-funding not renewed (May 2017)			21	21	20	20	20	20	34	34
Australia Network (May 2014)	19	19	19	19	19	19	19	19	19	19
Total	28	49	96	104	116	116	130	145	117	117
Accumulated funds “lost”	28	77	173	277	393	509	638	783	900	1017

Source: Portfolio Budget Statements (2020-21)⁴⁶

*Total: funds cut/not renewed/indexation not applied/contract cancelled.

45 Department of Infrastructure, Transport, Regional Development and Communications. ‘Portfolio Budget Statements 2020-21: Australian Broadcasting Corporation’. *Australian Government*. (2021).

31 46 As above.

The importance of government support for a strong media

A rigorous body of research has clearly shown that government incentives and public policy interventions such as tax rebates and subsidies for local and public interest journalism strengthen media, despite some claims from commercial media corporations that government support for the media sector compromises private enterprise.

Research conducted by the Reuters Institute — investigating case studies in Finland, Italy and France — found that incentives such as targeted subsidies, discounted rates and cross-media influence “helped the press increase its reach, helped smaller publications survive, and helped bigger ones increase both their profits and their potential to do public good”.⁴⁷ It is also important to note that commercial media organisations have also historically received considerable public support through tax exemptions and similar regulatory relief.⁴⁸

47 Nielsen, R. K, & Linnebank, G. ‘Public support for the media: A six-country overview of direct and indirect subsidies’. *Reuters Institute*. (2011).

48 Coordinating Committee for Media Reform. ‘Funding models for news in the public interest’. *Media Reform Coalition* (2011).

CROSS-MEDIA INFLUENCE

Snapshot of key findings

- The power of print titles in setting the news agenda is intensified through content-sharing deals between media corporations in cross-media settings
- Among the list of the most powerful digital media owners, News Corp is ranked highest as the first media content producer. News Corp is ranked fourth only after Google, Facebook and Microsoft — corporations that are progressively gatekeepers of digital content, but who do not actually produce it
- Nine owns the number one radio station in Sydney and Melbourne⁴⁹ (2GB and 3AW), five commercial metropolitan television licences and two major metropolitan newspapers
- News Corp dominates the radio market, owns metropolitan daily newspapers in each capital city, regional newspapers and 65% of Foxtel

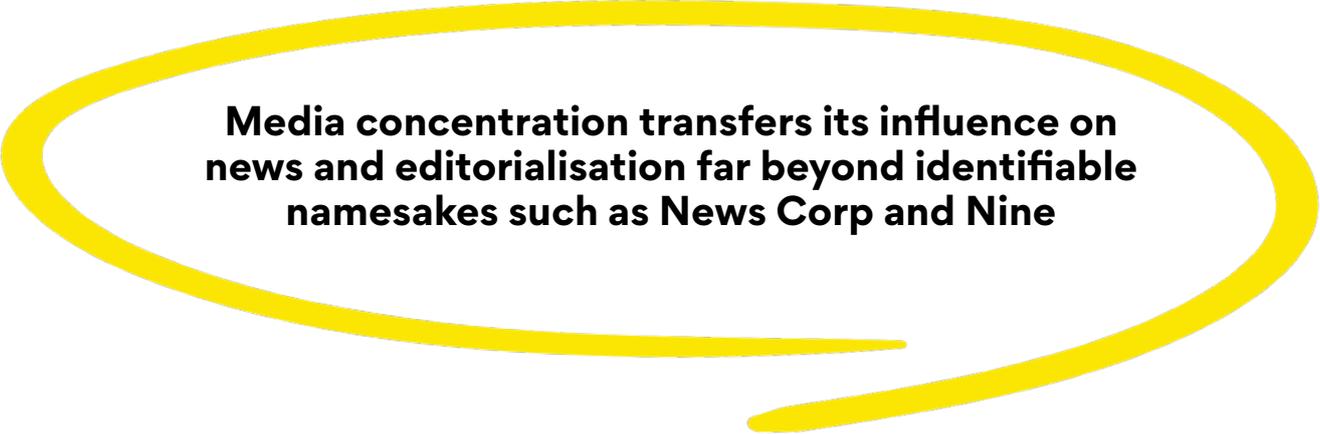


February 18, 2021 social media giant Facebook moved to prohibit publishers and people in Australia from sharing or viewing Australian and international news content in response to Australia's proposed media bargaining laws. Photo credit: AAP Image/Lukas Coch.

Power in cross-media influence

Understanding the dynamics between media corporations and media distribution across channels and platforms — print, radio, television, and digital — is essential to discerning the influence that media corporations and media distribution has beyond the media platforms on which news is initially broadcast. Media corporations and their control of media distribution plays a critical role in setting the public agenda.

A powerful few media corporations ‘create’ the news. These same corporations with corporate ownership of media distribution services ‘package’ this news across newswire distribution services. This news is then distributed and published across a range of channels and platforms. Media concentration transfers its influence on news and editorialisation far beyond identifiable namesake such as News Corp and Nine.



Media concentration transfers its influence on news and editorialisation far beyond identifiable namesakes such as News Corp and Nine

Concentrated control of distribution, alongside corporate ownership across multiple media platforms, can be transformed into exceptional power and influence over the narrative and shape of our democracy.



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The influence of inter-media agenda setting has been highlighted in a number of academic studies since the 1990s — issues deemed important by elite corporate newspapers directly influence the news agendas of local newspapers and television news programs,⁵⁰ as well as digital news platforms.

The analysis of media agenda-setting requires rigorous content analysis of specific outlets and platforms with a focus on finding evidence of relationships. However, it is also important to identify the economic and organisational structuring of agenda-setting relationships. That is, how the economic relationships of ownership, content licensing, and supply frame the setting of the news agenda.

Historically, both radio and television channels have relied heavily on newsfeeds from the Australian Associated Press (AAP), which was majority-owned by the two major publishers, Fairfax (now Nine) (45%) and News Corp (45%), with clear effects on the diversity of output. After almost having to close its doors in June 2020, AAP was sold to an investment consortium led by former News Corp executive Peter Tonagh. However the establishment of a rival newswire owned by News Corp later that year has raised concerns for fair competition and further entrenchment of media concentration by reducing the diversity of content and voices in the media landscape.⁵¹

News media bargaining and media concentration

In early 2021, in parallel to the Senate inquiry into media diversity, Australian Parliament passed the *Treasury Laws Amendment (News Media and Digital Platforms Mandatory Bargaining Code) Bill 2021*, or “the News Media Bargaining Code”. The legislation has been claimed — by the Morrison Government⁵² and by Australia’s biggest media corporations⁵³ — as a great victory of a government trying to curb the influence of Big Tech companies. However, a closer look at the Code — which aims to get Big Tech companies such as Google and Facebook to pay traditional media companies for news — shows the biggest winner of this battle are large media companies like News Corp, who actively campaigned for the Code on the pages of their papers. The biggest losers are all of us, everyday people living in Australia.

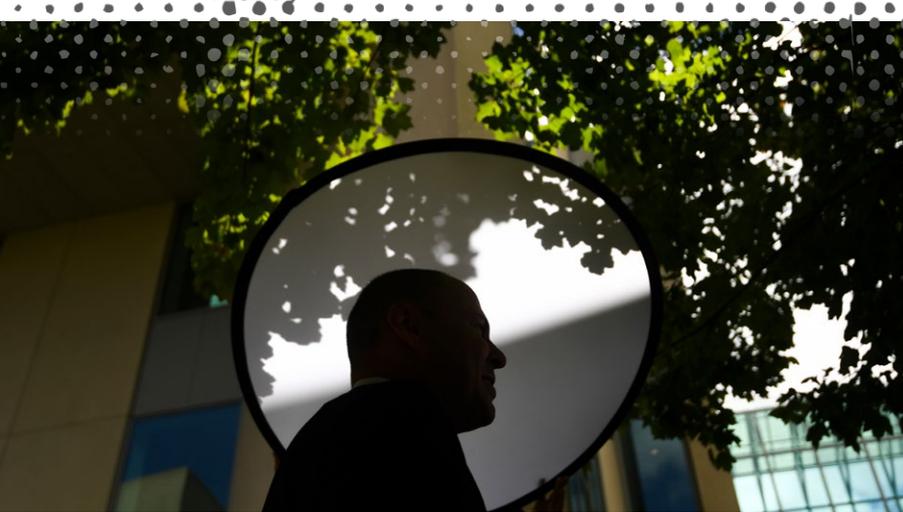
The Code’s stated aim is to address a bargaining power imbalance between Big Tech corporations like Google and Facebook and media companies, as a result of their growing dominance of the digital advertising market in Australia. The Code is the

50 Protes, D, & McCombs, M. E. ‘Agenda setting: Readings on media, public opinion, and policymaking’. *Routledge*. (2016).

51 Hurst, D. ‘ACCC puts News Corp on notice that it’s closely watching newswire duel’. *The Guardian*. (21 October 2020).

52 McHugh, F. ‘Google strikes \$30m deal with Nine with bargaining code in parliament’. *news.com.au*. (17 February 2021).

53 Media bargaining code is a ‘big win’ for government and Treasurer Josh Frydenberg’. *Sky News*. (17 February 2021).



Josh Frydenberg speaks to the media during a media bargaining code press conference at Parliament House in Canberra, Wednesday, February 17, 2021. Photo credit: AAP Image/Lukas Coch.

result of a long process and negotiation between the ACCC, the Morrison Government, Facebook, and Google, and echoes similar debates in the U.S., the European Union, and Canada.⁵⁴ However, the solution embraced in Australia can only be viewed as a critically missed opportunity — to support local public interest journalism and address media concentration imbalances.

Why the Code has failed — and will make media concentration worse

- The Code only applies to media entities with already substantial revenues (>\$150,000), thus barring smaller news institutions, especially community or locally-led initiatives, that mostly need help considering the dire state of local journalism in Australia
- The Code doesn't mandate how much should be paid. Instead, this is left to private organisations, defeating the intent to redistribute resources to address the problems of struggling media and lack of public interest content in that media. The lack of transparency around these private deals makes it impossible for the public to have a clear idea of the resources that will be invested in journalism initiatives, thus accelerating the privatisation of public policy
- The Code leaves no incentive for further negotiation with smaller organisations. Leaving Google and Facebook to decide which media companies to fund has already resulted in major deals being signed only with the biggest organisations in the market. Australia's three biggest players in print media — News Corp, Nine, and Seven West Media — were all first in line to score hundreds of millions of dollars in annual payments from the Big Tech companies.⁵⁵ Early estimates suggest that News Corp, Nine, and Seven West Media will together stand to gain 90% of Facebook's total revenue under the code⁵⁶

54 Brevini, B. Amazon, Understanding a Global Communication Giant. (2021).

55 Meese, J. 'Why Google is now funnelling millions into media outlets, as Facebook pulls news for Australia'. *The Conversation*. (18 February 2021).

56 Warren, C. 'Diversity hit between the eyes as old media pockets about 90% of big tech cash'. *Crikey*. (24 February 2021).

These deals not only increase the economic power of the same dominant players, but will also compound their reach, through distribution of their own content via Facebook and Google. This all comes at the expense of local and small outlets.

The Code is an example of both media policy and ongoing negotiation being led and designed by big media and tech companies for the financial benefit of these companies, and not led for good public outcomes through considered government process. Private deals between big media conglomerates and Big Tech are never really a victory for the public. The Code only exacerbates the already dominant power of a few large media corporations — it differs wildly from what a media policy that prioritises the public interest should look like.⁵⁷

Cross-media influence and revenue

The concentration of economic power can be seen in Australia’s three major media corporations — News Corp, Nine and Seven West Media — who collectively earned an estimated \$7 billion in 2020. As Figure 3 shows, News Corp accounted for over half of that revenue.

Figure 3 – News Corp global and estimated Australian 2020 revenue.

	2020 global	2020 Australian (est.)
Segment	\$ billion	\$ billion
Subscription video services	1.9	1.9
News media	2.8	1.0
Digital real estate	1.1	1.1
Dow Jones	1.6	
Book publishing	1.7	
Total	9.0	4.0

Sources: News Corp second quarter results, 2020;⁵⁸ News Corp second quarter results, 2021.⁵⁹

57 Brevini, B. ‘Facebook vs Morrison: whoever wins, Australia loses’. *South China Morning Post*. (20 February 2021).

58 News Corp. ‘News Corporation reports second quarter results for fiscal 2020’. *News Corp*. (2020).

59 News Corp. ‘News Corporation reports second quarter results for fiscal 2021’. *News Corp*. (2021).

Nielsen has released a 2021 report listing the top 20 digital media parent corporations (see Figure 4) — including platforms, communities, news organisations, retailers, financial services, government and entertainment providers — each reaching over nine million Australians a month. Figure 4 shows the consistent dominance in cross platform markets by News Corp. Among the list of the most powerful digital media owners, News Corp is ranked highest as the first media content producer. News Corp is ranked fourth after Google, Facebook and Microsoft — corporations that are progressively gatekeepers of digital content, but who do not actually produce it.



Among the list of the most powerful digital media owners, News Corp is ranked highest as the first media content producer. News Corp is ranked fourth after Google, Facebook and Microsoft — corporations that are progressively gatekeepers of digital content, but who do not actually produce it.



Figure 4 – The top 20 digital media owners.

Rank	Parent	Unique audience (000s)
1	Google	19,998
2	Facebook	18,026
3	Microsoft	17,407
4	News Corp	16,610
5	Nine Entertainment	15,676
6	eBay	14,758
7	Australian Federal Government	14,739
8	Australian Broadcasting Corporation	13,590
9	Woolworths	13,418
10	Amazon	12,466
11	Coles Group	12,329
12	Apple Inc.	12,289
13	PayPal	12,206
14	Seven West Media	11,536
15	Wikimedia Foundation	10,428
16	InterActiveCorp	10,147
17	DMG Media	9,803
18	Commonwealth Bank	9,682
19	Verizon Media	9,256
20	Twitter	9,019

Source: Nielsen, 2020⁶⁰

60 Nielsen. 'Digital Content Ratings: Top 10 Current Events and Global News December 2020'. *Nielsen*. (2020).

Two out of three rule

News Corp and Nine’s cross-media dominance was made possible when the Australian Government repealed the ‘two out of three’ rule in 2017. Traditionally media corporations were only allowed to own media in two out of the three media markets — print, radio and television — but not all three. This deregulation allowed for Nine’s acquisition of Fairfax media outlets, including *The Sydney Morning Herald* and *The Age* newspapers and the Macquarie Media radio services.

Cross-media influence analysis shows Nine owns the number one radio station in both Sydney and Melbourne — 2GB and 3AW⁶¹ — along with five commercial metropolitan television licences and two major metropolitan newspapers. News Corp dominates the radio market, owns metropolitan daily newspapers in each capital city, along with regional newspapers and 65% of Foxtel.



Former Prime Minister Malcolm Turnbull, when he held the portfolio for communications, oversaw the relaxation of media ownership laws. Mr Turnbull sent a policy recommendation to then Prime Minister Tony Abbott’s office to scrap the so-called “two out of three” rule and the “reach” rule (see below). Photo credit: Shutterstock.

MEDIA REGULATION

Snapshot of key findings

- Three major changes to media regulations since the 1980s have facilitated the increasing concentration of media ownership
- Media regulation changes made in 2017 effectively ended restrictions over media ownership, permitting media corporations to own and use media assets to reach the entire population
- The 2017 deregulation of the national media market led to a wave of takeovers and mergers between large media entities, further entrenching Australia’s media market as the most concentrated in the developed world

Why media regulation matters

The excessive power enabled by the media concentration of big media companies, translates directly into the political power to control development of media policy and regulations. Studies have demonstrated how, specifically in the Australian context, media policy has progressively become “big media policy” — that is, policy designed to cater to the interests of dominant media corporations.⁶²

It is no secret that these large corporations actively lobby for the deregulation of the media market. This was on full display during the Finkelstein Inquiry of 2012, where News Corp — then “News Limited” — made a submission concisely summarising the neoliberal stance held by dominant media companies on why new proposals for media reforms have to be rejected:

“Decision makers should not fall in the trap of thinking that because a market is not perfect, it needs to be regulated. Regulation, in whatever form, will limit the availability of information to consumers, it will limit choice and it will be disincentive to investment. Regulation can only act to close a market”⁶³

However, public policy, and especially media ownership regulation, was established to ensure media diversity and pluralism in the public interest. Despite this, the media sector has been consistently deregulated to serve the interests of dominant media organisations and owners, rather than Australian communities.

62 Brevini, B. ‘From media policy to ‘big’ media policy: The battle for pluralism in Australia’. In Barnett, S. and Townend, J. *Media Power and Plurality*. (2015).

63 News Limited, ‘Submission to the Independent Inquiry into Media and Media Regulation’. (11 November 2011).

Regulation is key to ensuring the management of scarce public resources, like the radio spectrum. The rationale for media ownership regulation and related media public policy includes a need to ensure media diversity — to ensure many different voices or outlets provide a range of news and information. Past public policy interventions that have acted in the public interest to ensure a diversity of media outlets include:



An inquiry into the Australian print media examining increasing regulation must include the nation's largest newspaper empire owned by Rupert Murdoch's News Corp. Photo credit: AP Image/Rick Rycroft.

- Regulation related to broadcasting service ownership
- The number of services that could be held by a single licensee in a broadcast area
- Ownership of different platforms — such as radio, television, or print media in the same 'licence' area
- Limits on 'foreign' ownership⁶⁴

The regulation of Australian media

The Australian Constitution gives “the Commonwealth powers to license and regulate broadcasting, telecommunications and, since the late 1990s, the Internet”.⁶⁵ While having wide powers in relation to communications — including to regulate broadcasting and the use of the radio spectrum — the Australian Government has less authority in print media,⁶⁶ unlike other European countries that display an explicit concern for press freedom and pluralism.

The Broadcasting Services Act (BSA) sets most of the framework for Australian broadcasting in television and radio — as well as “provisions for regulating parts of the internet industry”⁶⁷ — and includes specific regulation for commercial television and radio broadcasters.⁶⁸ It is the BSA that gives authority to Australia's media regulator —

64 Gardiner-Green, J & Chowns, J. 'Media Ownership Regulation in Australia. E-Brief: Online only'. *Australian Parliamentary Library*. (2006).

65 Section 51(v) of the *Commonwealth of Australia Constitution Act*; Flew, T & Swift, A. 'Regulating journalists? The Finkelstein Review, the Convergence Review and news media regulation in Australia. *Journal of Applied Journalism & Media Studies*, 2(1). (2013), p 10.

66 Flew, T & Swift, A. 'Regulating journalists? The Finkelstein Review, the Convergence Review and news media regulation in Australia. *Journal of Applied Journalism & Media Studies*, 2(1). (2013). pp 181-199.

67 Wils, T. 'Media and broadcasting in the digital age'. *Australian Parliamentary Library*. (n.d.) media regulation in Australia. *Journal of Applied Journalism & Media Studies*, 2(1). (2013). pp 181-199.

68 Australian media policy and regulations relating to commercial television licensing, the use /or licencing to spectrum use including the Broadcasting Spectrum Band (BSB), local content rules, and related matters are currently the subject of a public review, mandating content obligations for the ABC and SBS are currently the subject of a public policy consultation: *Media Reform Green Paper: Modernising television regulation in Australia*. (November 2020).

the Australian Communications and Media Authority (ACMA). Established in 2005 as a statutory authority, ACMA's role is to "regulate communications and media to maximise the economic and social benefits for Australia".⁶⁹ It is responsible for regulation in the areas of broadcasting, tele-communications, radio-communications, and online industries — administering six pieces of legislation, including the *Broadcasting Services Act 1992* and related radio and tele-communications legislation.

Alongside ACMA, The Australian Competition and Consumer Commission (ACCC) has a key role to play in the economic regulation of the communications sector, including the broadcasting and content sectors, with industry-specific competition and access functions.

The public service broadcasters have their own legislation which contains the rules the ABC and SBS must adhere to.

Regulating media ownership

Media ownership regulation had been in place in some form since 1956⁷⁰ for television and for radio since 1935⁷¹. Prior to the 1980s, commercial television and radio corporations were limited in the number of licences they could hold⁷² which "ensured a low level of concentration" by limiting the number of services that could be owned by an individual.⁷³ Radio licence areas are the unit of reference used in regulation and are used by ACMA to refer to a specific area for spectrum management, broadcast license allocation, and ownership rules. Commercial operators were limited to one radio service licence in any area, and no more than six licences in Australia. Similarly, commercial operators could not own more than one television licence in any area and could not own more than two television licences in Australia — this was known as the 'two station rule' and meant that commercial organisations were prevented from establishing large, national television and radio networks.⁷⁴

There have been three major legislative changes since the 1980s that have reshaped the ownership of Australian media and have, by deregulation, actively entrenched concentration of media ownership in Australia.

69 ACMA. 'What we do'. ACMA website. (n.d.).

70 Hirst, M, Hope, W. and Thompson, P. (2016). Australia and New Zealand in Birkinbine, B., Gómez, R., & Wasko, J. (Eds.). *Global media giants*. Routledge.

71 Papandrea, F & Tiffen, R. 'Media Ownership and Concentration in Australia.' In M. Noam, E., *Who owns the world's media?: media concentration and ownership around the world*. (2016).

72 Brevini, B. 'Public Service and Community Media'. In Mansell, R. & Hwa Ang, P. (eds). *The International Encyclopedia of Digital Communication and Society*. (2015a).

73 Papandrea, F & Tiffen, R. 'Media Ownership and Concentration in Australia.' In M. Noam, E., *Who owns the world's media?: media concentration and ownership around the world*. (2016).

Figure 5 – Australian media ownership changes pre-1987-2016.

	Number of licences	Reach	Cross-media
Pre-1987	Commercial television limited to two licences. Commercial radio limited to six.		No restrictions.
1987-2006	Commercial television is limited to 75% national reach. Commercial Radio limited to two licences in one licence area.	75% national reach.	No cross-media ownership between television, newspapers, and radio in a licence area beyond 15% (control stake).
2006-2017	No major changes. Three digital services per licence in any licence area.	No major changes.	Minimum number of voices: the ‘4/5’ rule – there must be no fewer than five independent and separately controlled media operators or groups in a metropolitan commercial radio licence area, and no fewer than four in a regional area
2017	Removal of overall limits on licence ownership. Retained one-to-a-market’ (television) rule and the ‘two-to-a-market’ (radio) rule.	Removal of ‘75% reach’ rule.	Removal of ‘two out of three’ rule.

Note: Figure 5 based on a table originally published in Brevini, 2015.⁷⁵

Changes to media ownership laws in 1987 removed the limit on the ‘two station rule’, instead replacing it broadly with a cap on national audience reach, set at 75% of the Australian population.⁷⁵ With the main five metropolitan markets accounting for approximately 65% of the population, this enabled the main three television services — Seven, Nine and Ten — to evolve into metropolitan networks. At the same time, while concern about ‘cross-media’ ownership had existed almost from the beginning of broadcasting, there had been no legislative limits put in place until 1987.⁷⁶ From 1987, commercial media organisations were limited in the range of different media outlets or platforms they could own and operate in the same area. The ‘two out of three’ rule allowed a media operator to own two of radio, television or print in a licence area, but not all three. This aimed to prevent a single person or company from controlling more than two out of three media platforms — commercial radio, commercial television, and newspaper — in the same radio licence area.

75 Papandrea, F & Tiffen, R. ‘Media Ownership and Concentration in Australia.’ In M. Noam, E., *Who owns the world’s media?: media concentration and ownership around the world.* (2016).

76 As above.

The “localism policy [of two station ownership limit] protected the financial viability and corporate integrity of television stations outside Sydney and Melbourne”.⁷⁷ However, removing the two-station rule and establishing a 75% reach rule paved the way for the aggregation of the previously predominantly ‘stand-alone’ regional market ownership into regional networks dominated by three corporations — WIN, Southern Cross, and Prime. The changes led to significant realignments in media ownership as, within a year, “13 of 19 metropolitan newspapers changed hands, and 11 of 17 metropolitan commercial television stations changed owners” and while “[c]ross-ownership between newspapers and broadcasting was almost completely eliminated... concentration within both industries increased”.⁷⁸

Policy shift to media deregulation

In 2006, amendments to the *Broadcasting Services Act* “weakened existing cross-media ownership laws and eased restrictions on foreign media ownership”.⁷⁹ While limitations such as ‘one to a market’ television and ‘two to a market’ radio’ rules were retained, “broadcasting specific restrictions on foreign investment in Australia’s media sector” were removed.⁸⁰ The new approach included a points system to define “unacceptable media diversity situations” and a prohibition on a person “controlling more than two out of three regulated platforms” in a licence area.⁸¹

The 2006 ownership amendments were the first to be enacted following the introduction of subscription television in Australia in the mid-1990s.⁸² However, no allowances were made in cross-media or other rules for the ownership of a subscription service licence or the increasing significance of online media services, notwithstanding the findings of the 2012 Convergence Review.⁸³

Following the 2006 changes, the number of entities controlling broadcasting licences declined from 34 to 32 for radio and from eight to seven for television, “despite the release of new licences.”⁸⁴

77 O’Regan, T. ‘Australian television culture’ (1993), p 24.

78 Papandrea, F & Tiffen, R. ‘Media Ownership and Concentration in Australia.’ In M. Noam, E., *Who owns the world’s media?: media concentration and ownership around the world.* (2016).

79 Hirst, M, Hope, W, and Thompson, P. ‘Global media giants’ (2016), p 353.

80 Cunningham, S. ‘Policy and Regulation’. In Cunningham, S. & Turnbull, S. (eds). *The Media and Communications in Australia (4th ed.)* (2014)., p 86.

81 As above.

82 Harrington, S. ‘Television’. In Cunningham, S. & Turnbull, S. (eds). *The Media and Communications in Australia (4th ed.)* (2014).

83 Brevini, B. ‘Public Service and Community Media’. In Mansell, R. & Hwa Ang, P. (eds). *The International Encyclopedia of Digital Communication and Society.* (2015a).

84 As above.



I am an elderly person living alone happily, as long as I have contact with the community through the media. But that is increasingly difficult. WA is already isolated from the rest of Australia — but now we even struggle to connect to our local communities through stories in local news. Our one daily newspaper, The West Australian, is totally sensationalist. Instead of stories, the pages are filled with real estate ads and sensationalist content. I'm not alone. One need only look to the lines of elderly folk in public libraries waiting for newspapers. Community news is so obviously important to the elderly (like me) — to keep abreast of disasters like impending bushfires and heat waves. But more than that to know about local events — how else can we ensure the Fremantle arts scene thrives? — and local stories. To stay connected.”

Peter – Fremantle, WA.

Ownership and media convergence

The 2011 Convergence Review into Australia’s regulatory approach to broadcasting and communications recommended a new approach to media policy.⁸⁵ Its approach recognised media pluralism and the need “to foster diversity of media content” remain critical in a converged media system”.⁸⁶ The review identified the need for “ongoing regulation of media communications” in media ownership and other areas.⁸⁷ To address the concerns about media ownership concentration its recommendations included “a new communications regulator... [keeping] regulation of ownership of local media through a ‘minimum number of owners’ rule... [and the need to] assess large scale mergers based on a ‘public interest test’”.⁸⁸ While these recommendations of further regulations were opposed — in a “response from the commercial media [that was]... united and fierce”⁸⁹ — eventually two aspects of the Convergence Review’s recommendations were implemented in 2017. These were the removal of the ‘75% reach’ and ‘two out of three’ rules.

Similarly, the 2012 Finkelstein Review, while addressing different media issues, expressed the need for media pluralism as “Australia’s newspaper industry is among the most concentrated in the developed world”.⁹⁰ The Finkelstein Review articulated a concern for circumstances where a “handful of people (media owners or journalists) ... unduly influence public opinion” and the possible impact on standards due to “the absence of effective competition”.⁹¹ According to Finkelstein,⁹² concentration of media ownership contributes to a sense that media organisations have too much power leading to a “general distrust of the media [that] ... adversely affects democracy”.

According to Finkelstein, concentration of media ownership contributes to a sense that media organisations have too much power leading to a “general distrust of the media [that] ... adversely affects democracy”⁹³

85 As above.

86 Brevini, B. ‘From media policy to ‘big’ media policy: The battle for pluralism in Australia’. In Barnett, S. and Townend, J. *Media Power and Plurality*. (2015), p 121.

87 cited in Cunningham, S. ‘Policy and Regulation’. In Cunningham, S. & Turnbull, S. (eds). *The Media and Communications in Australia (4th ed.)* (2014), p 89.

88 As above.

89 As above, p 123.

90 Finkelstein, R, & Ricketson, M. ‘Report of the Independent Inquiry into Media and Media Regulation’. *Department of Broadband, Communications and the Digital Economy*. (2012).

91 As above, p 280.

92 As above, p 281.

93 As above.

2017 media ownership changes

In 2017 the Australian Government repealed legislation that had prevented media concentration, specifically the ‘two out of three’ cross-media and ‘75% reach’ rules, stating that the old laws were redundant in an era of digital and online media.⁹⁴ The Government’s policy rationale was that the old rules were no longer needed because “the digital age is now defined by the wide range of media voices and perspectives available to consumers”,⁹⁵ despite online sources of information being powerfully dominated by traditional media organisations.

These changes came after years of reported lobbying by the most powerful media executives in the Australian media sector. In 2014, Malcolm Turnbull, the Communication Minister at the time, met several times with these executives, whose primary aim was to lobby for the repeal of existing concentration rules.⁹⁶ Three years later, Turnbull oversaw and supported these changes as Prime Minister.

While the BSA was amended, it continued to use the historical approach of ownership of “newspapers and television licences in each radio licence area as the basic unit”⁹⁷ for assessment. Under the new legislation, a ‘media operation’ is a commercial television broadcasting licence, a commercial radio broadcasting licence or an ‘associated newspaper’. A media group with two or more ‘media operations’ must be registered with the ACMA under certain conditions, including where a group holds a commercial television licence and a radio licence that reaches 50% of the population in that area, or a newspaper in the group is associated with a radio licence area.⁹⁸ A points scheme is used to calculate media diversity. In metropolitan areas, the points must not go below five and in regional areas cannot drop below four points. The new rules mean there must be at least five independent and differently controlled and owned media organisations operating in metropolitan areas and four such operations in regional areas.

The 2017 changes effectively ended restrictions over media ownership and permitted media corporations to own and use media assets to reach the entire population.

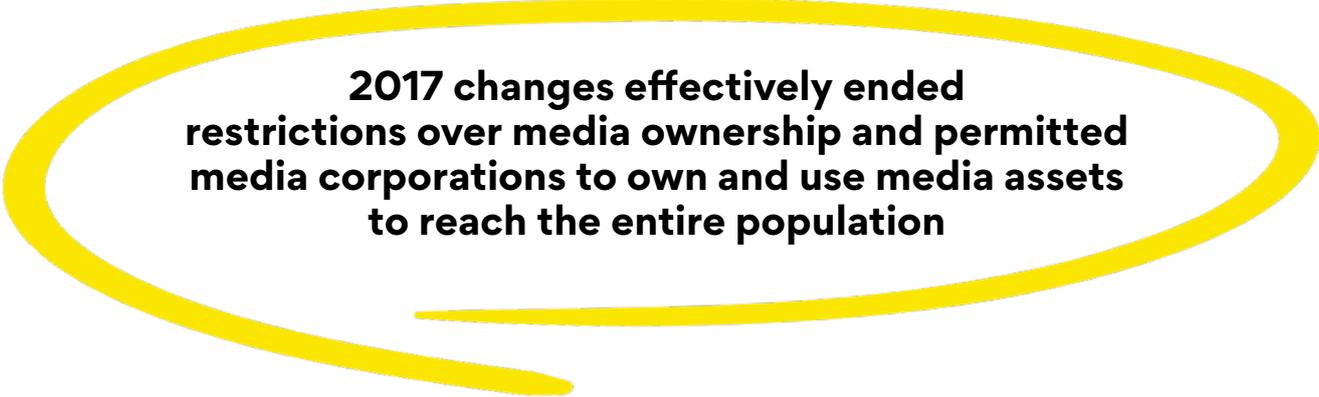
94 Fifeild, M. ‘Historic media reforms pass Parliament’. *Department of Infrastructure, Transport, Regional Development and Communication*. (2017).

95 Department of Infrastructure, Transport, Regional Development and Communication. ‘Updating Australia’s media laws’. *Department of Infrastructure, Transport, Regional Development and Communication*. (n.d.)

96 Dwyer, T. ‘Press Freedom Discourse after Leveson: Ethics, Elections and Media Concentration in Australia.’ *The Political Economy of Communication*, 2(1). (2014). pp 49-59.

97 Brevini, B. ‘From media policy to ‘big’ media policy: The battle for pluralism in Australia’. In Barnett, S. and Townend, J. *Media Power and Plurality*. (2015), pp 116-130.

98 ACMA. ‘Statutory control rules. Limitations on control of media’. *ACMA*. (n.d.)



2017 changes effectively ended restrictions over media ownership and permitted media corporations to own and use media assets to reach the entire population

In the media sector, experience shows that deregulation leads to increased concentration. A 2007-08 Australian Department of Parliamentary Services research paper into media deregulation found that the “numbers of media outlets have diminished, takeovers and mergers have consolidated the power of major groups and independent media voices have declined” following the passage of media deregulation reform in the United States. The report also warned that “there is a strong risk a similar, comprehensive transformation of the media landscape may take place in Australia”.⁹⁹

Since the report’s publication, its warnings have borne out. Following the 2017 changes, there was a “wave of consolidation (as well as some disposals) in the Australian media sector”.¹⁰⁰ The purchases included Nine’s purchase of Fairfax Media’s main print and radio assets and Macquarie Media and Seven West Media’s attempted acquisition of Prime Media Group.¹⁰¹ Australian Community Media purchased 160 of Nine’s recently acquired (formerly Fairfax) regional print assets.

While the neo-liberal argument of allowing such market access is that competition will deliver a diversity of media entities, sources, perspectives and viewpoints, the opposite has been the case. Everyday people living in Australia have been the victims of the consequences of ongoing media deregulation.



Everyday people living in Australia have been the victims of the consequences of ongoing media deregulation

99 Jolly, R. ‘Media ownership deregulation in the United States and Australia: in the public interest?’. *Parliament of Australia*. (24 July 2007).

100 Myllylahti, M, & Baker, S. ‘JMAD New Zealand Media Ownership Report 2019’. *AUT research centre for Journalism, Media and Democracy*. (2019), p 14.

101 As above, p 13.

PRINT AND DIGITAL NEWS MEDIA

Snapshot of key findings

- News Corp is the dominant owner of Australian print and digital media, controlling 59% of metropolitan and national readership — up from 25% in 1984
- Nine is the second-largest media owner with a combined 23% readership share. Seven West Media Limited has 15% of the market by readership
- News Corp now controls the majority of local and regional newspaper titles in Australia
- Sydney and Melbourne are the only two cities with two media corporations competing for readership — News Corp and Nine. Brisbane, Adelaide, Darwin and Hobart have one single daily masthead owned by News Corp. Perth's one daily newspaper is owned by Seven West Media. Canberra's one daily newspaper is owned by Australian Community Media
- The dominance of News Corp is reflected not only in the news market, but as a high-ranking online content producer.
- Between 2008 and 2018, 106 local and regional Australian newspaper titles closed their doors. 21 local areas that previously had at least one local newspaper were left without access to a dedicated local print publication for their area.
- At least 5,200 Australian journalism jobs have been cut between 2012 and 2020.

Concentration in Australia's national and metropolitan print markets

The newspaper market remains crucial in securing a functional public sphere and democracy. The print market has traditionally set the public agenda — both across media platforms, but also retaining significant influence over the daily political agenda. At the same time, as more people consume news online, it is important to also understand the evolution of online news markets to assess who are the major gatekeepers. While digital news outlets — like *The Guardian* — have an increasing role to play in the online public sphere, international studies provide ample evidence of the print newspapers retaining their power in the online news market.

Historically, the highpoint in Australian print media diversity was a century ago when the metropolitan capital cities had 26 newspapers and 21 were independently owned.¹⁰² However, after World War II, concentration increased incessantly to the point that our media landscape is now one of the most concentrated in the world,¹⁰³ with lack of pluralism of ownership becoming a frequent issue for debate in Australian politics.

In 2020, Australia's metropolitan and national daily press consists of 31 titles, with 55% (17 titles) owned by News Corp. That total number drops to 21, when taking into account the weekend editions of the same titles, with 11, or 52%, of these being owned by News Corp.

News Corp is the unchallenged, dominant print media player in Australia, owning 59% share of the metropolitan and national press by readership — see Figure 6.

Nine is the second ranked player (after its takeover of Fairfax) with a combined 23% readership share. The third major player, Seven West Media Limited — owned by Kerry Stokes — has 15% of the market by readership.

The two largest media corporations — News Corp and Nine — each have one national paper, and otherwise only compete directly with each other in Sydney and Melbourne. All other markets have only a single, unchallenged daily paper owned by:

- News Corp in Brisbane, Adelaide, Darwin, and Hobart
- Seven West Media in Perth
- Australian Community Media in Canberra

That these media organisations only compete in the most lucrative markets is no coincidence; it is only in these areas — Sydney and Melbourne — that it is *worth* competing with other media companies. Without competition, media organisations can exert complete monopoly control over that area, amassing great revenue, reducing or stifling the range of perspectives, and leaving communities vulnerable to the domination of particular views and interests. This is not to mention the kind of political power this creates, leaving our democracy weakened. For the majority of Australia's capital cities, this is a reality.

102 Mayer, H. *The Press in Australia*. (1964), p 31.

103 Papandrea, F & Tiffen, R. 'Media Ownership and Concentration in Australia.' In M. Noam, E., *Who owns the world's media?: media concentration and ownership around the world*. (2016).

“

Working in aged care, I have seen so many of our elderly residents disappointed with the local paper only being available by the digital method. Most of our residents are not computer or mobile phone savvy and this means they cannot access local news. Our retired farmers are unable to follow farming news and trends and some have not known about old friends having passed away. For the rest of the community we miss out on local sport, special events, sales, markets, and keeping abreast of local news. It was a sad day when we lost our hard copy newspaper that had been serving our community for generations.”

Kim – Bundaberg, QLD.

Figure 6 – Newspaper readership in Australia, by publisher.

Concentration in the national print market is shown by calculating the readership share of each corporation.

Audience share ('000s)	2012	%	2018	%	2020	%
News Corp	8,162	62%	5,014	61%	4,149	59%
Fairfax	3,295	25%	2,120	26%	-	-
Nine EC	-	-	-	-	1615	23%
Australian Community Media	-	-	-	-	201	3%
Seven West Media	1,782	13%	1,104	13%	1,060	15%
Total	13,239		8,238		7,025	

Source: Roy Morgan readership results for the years ending December 2012,¹⁰³ December 2018,¹⁰⁴ December 2020.¹⁰⁵

In 2018, News Corp controlled 61% of the print news market. Due to the sale of Here, There & Everywhere (formerly APN News and Media), News Corp's ownership of the print market dropped to 59% in 2020. This is still more than double the share of Nine, which controls 23% after its merger with Fairfax.

104 Roy Morgan. 'Roy Morgan Readership results for the year ending December 2012'. *Roy Morgan*. (2012)

105 Roy Morgan. 'Roy Morgan Readership results for the year ending December 2018'. *Roy Morgan*. (2018)

106 Roy Morgan. 'Roy Morgan Readership results for the year ending December 2020'. *Roy Morgan*. (2020)

Figure 7 – Newspaper readership by title, 2012-2018-2020.

			Only readership ('000)		
	2020 ownership		2012	2018	2020
The Australian	News Corp	Daily National	405	299	400
Australian Financial Review	Nine EC	Daily National	234	184	159
NSW					
Daily Telegraph	News Corp	Daily Capital	781	575	403
Sydney Morning Herald	Nine EC	Daily Capital	612	403	355
Sunday Telegraph	News Corp	Weekend Capital	1,258	826	630
Sun Herald	Nine EC	Weekend Capital	868	502	403
MX	No longer active		126	-	-
Newcastle Herald	Australian Community Media		104	56	52
Illawarra Mercury	Australian Community Media		50	33	25
ACT					
Canberra Times	Australian Community Media	Daily Capital	77	44	44
VIC					
Herald Sun	News Corp	Daily Capital	1,116	690	564
The Age	Nine EC	Daily Capital	566	400	312
Sunday Herald Sun	News Corp	Weekend Capital	1,132	737	610
The Sunday Age	Nine EC	Weekend Capital	600	417	386
MX	-		162	-	-
Geelong Advertiser	News Corp		60	42	37
QLD					
Courier Mail	News Corp	Daily Capital	503	329	260
The Sunday Mail	News Corp	Weekend Capital	1,010	586	473
MX	No longer active		59	-	-
Cairns Post	News Corp		68	43	28
Gold Coast Bulletin	News Corp		98	56	34
Townsville Bulletin	News Corp		65	43	48
SA					
Adelaide Advertiser	News Corp	Daily Capital	449	256	220
Sunday Mail	News Corp	Weekend Capital	603	370	326
WA					
West Australian	Seven West Media	Daily Capital	493	338	328
Weekend West	Seven West Media	Weekend Capital	696	432	388
Sunday Times	Seven West Media	Weekend Capital	593	334	344
TAS					
The Mercury	News Corp	Daily Capital	92	53	44
The Examiner	Australian Community Media		66	27	35
The Advocate	Australian Community Media		47	29	20
Sunday Tasmanian (Tas)	News Corp	Weekend Capital	106	60	45
Sunday Examiner	Australian Community Media	Weekend Capital	71	25	25
NT					
Northern Territory News	News Corp	Daily Capital	36	24	14
Sunday Territorian	News Corp	Weekend Capital	33	25	13

Source: Roy Morgan readership results for the years ending December 2012,¹⁰⁷ December 2018,¹⁰⁸ December 2020.¹⁰⁹

107 Roy Morgan. 'Roy Morgan Readership results for the year ending December 2012'. *Roy Morgan*. (2012)

108 Roy Morgan. 'Roy Morgan Readership results for the year ending December 2018'. *Roy Morgan*. (2018)

109 Roy Morgan. 'Roy Morgan Readership results for the year ending December 2020'. *Roy Morgan*. (2020)

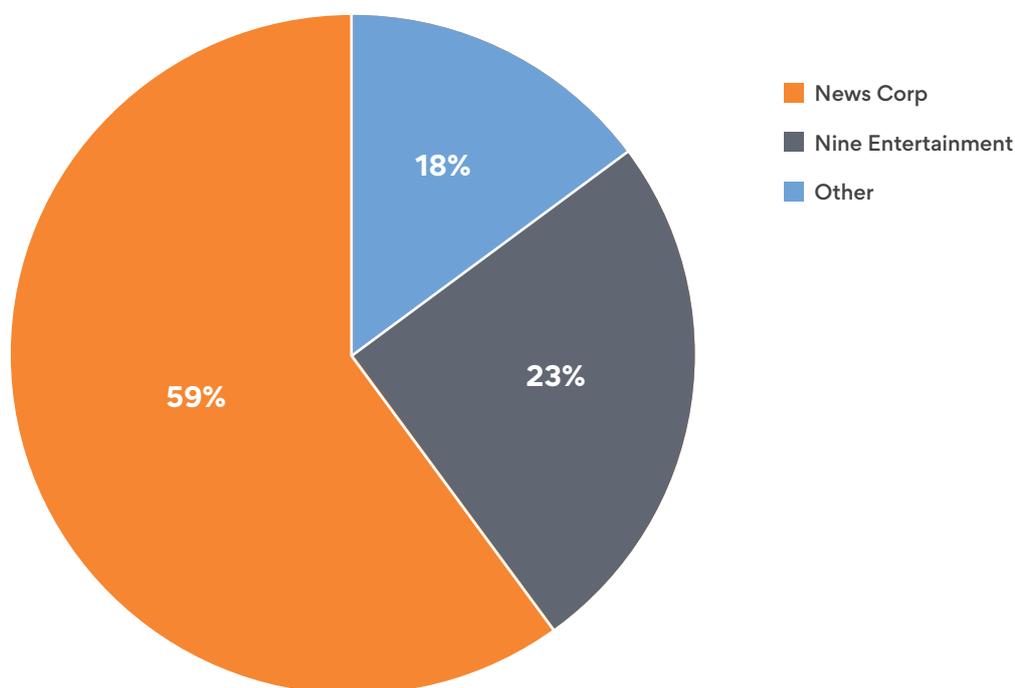
The dominance of News Corp

The sheer dominance of News Corp is a key contributor to Australia's media concentration crisis. News Corp controls, through direct ownership, almost two-thirds of weekly national and metropolitan readership share in the most populous markets in Australia. This ownership level is extremely high and has grown continually over the past four decades, rising from 57% in 2011, and 25% in 1984.¹¹⁰

This dominance is particularly significant considering the increasing role played by national and metropolitan newspapers in the Australian media landscape. The closure of local and regional media newsrooms over the past decade has placed increasing power on metropolitan and national papers and their agenda-setting influence.

However, what makes the state of Australia's media concentration so disturbing is not just that the sector is dominated by a single corporation, but that the vast share of the rest of the market is dominated by just two other corporations, Nine and Seven West Media.

Figure 8 – Concentration of newspaper market in Australia.



Source: Data used from Figures 6 and 7.



I live in a news black spot. Until recently, the only regional newspaper I had access to was owned by News Corp — but during the pandemic it stopped being printed, and is now only accessible digitally with a subscription. The printed newspaper was free — and consequently mostly advertorial. But at least it contained news about the local area — in the absence of a local news outlet or journalists, this is increasingly difficult to get. This is particularly troublesome for me because I live in a flood plain. In 2017 the only way to know how badly I was going to flood was to get in a car and drive to the river to check the water level along with everyone else in my area because we live in a news black spot since the local ABC was defunded. I haven't been through a bushfire yet but tuning into local ABC Radio is not an option for us. I wish it was, I wish there was someone watching out for us.

Local news journalism means that different voices from the community are heard, encourages local engagement with issues and provides an opportunity for a topic to be publicly debated. But since the local News Corp newspaper went 100% digital/subscription and the local ABC presence has been defunded, I miss out on all the good aspects of local journalism. My home and my life are invisible, and I feel like my voice and opinion is not welcome in the decisions affecting my world. It's wrong that I know far more about what is happening outside of Australia and my local area because there is no one here to tell our stories.”

Meredith – L o g a n, Q L D.

Figure 9 also helps us break down the concentration by publisher in terms of titles.

Figure 9 – Ownership of metropolitan newspapers: 2012, 2018, 2020.

Ownership	2012	2018	2020
Total metropolitan newspapers	34	31	31
News Corp	20	17	17
Fairfax	11	11	0
Nine EC	0	0	5
Australian Community Media	0	0	6
Seven West Media	3	3	3

Source: Roy Morgan readership results for the years ending December 2012,¹¹¹ December 2018,¹¹² December 2020.¹¹³

News Corp’s direct ownership of more than half of all metropolitan newspapers — which occupies a particularly valuable space in the Australian media landscape given the shrinking local and regional offerings — over the period of 2012–2020, is a clear demonstration of their dominance in the Australian media market.

What about revenue?

The picture of a highly concentrated — and tightly controlled and dominated — metropolitan and national newspaper market is confirmed by looking at revenue. A breakdown of revenues shows that News Corp — with annual 2020 revenue of \$1,005,000 in a market total of \$1,598,400 — holds a 62% share. This is more than double the total of its closest competitor, Nine, which holds 27%.

Revenue dominance — where a particular corporation controls over 60% of a total market — results in a level of excessive market power that distorts competition, generates structural inequalities in the distribution of economic and political power, and forces all other smaller market competitors to operate on the terms of the dominant corporation.

111 Roy Morgan. ‘Roy Morgan Readership results for the year ending December 2012’. *Roy Morgan*. (2012)

112 Roy Morgan. ‘Roy Morgan Readership results for the year ending December 2018’. *Roy Morgan*. (2018)

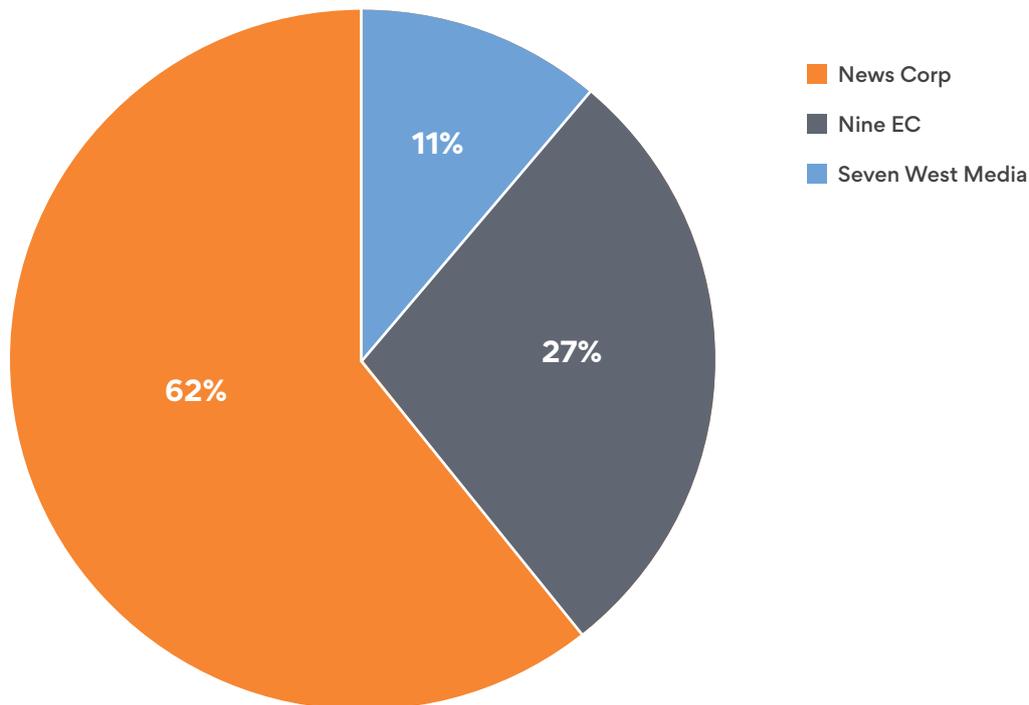
113 Roy Morgan. ‘Roy Morgan Readership results for the year ending December 2020’. *Roy Morgan*. (2020)

Figure 10 – Revenue and market share of media owners in the metropolitan and national newspaper market: 2012, 2018, 2020.

Company newspapers	Revenue 2012 \$'000	Revenue 2018 \$'000	Revenue 2020 \$'000	2020 market share
News Corp	1,900,000	1,279,000	1,005,000	62%
Fairfax	1,507,000	890,397	-	
Nine EC	-	442,900	426,300	27%
Seven West Media	348,400	204,100	167,100	11%

Note: In 2018 Fairfax was acquired by Nine. The 2012 column includes Fairfax's full year revenue from its print and online media and related operations, including, for example, Domain revenues. 2018 revenue data includes part year figures for both Fairfax and Nine, reflecting the ownership change that year. 2020 data reflects that former Fairfax print and related media revenue sources sold and kept by Nine are now in the Nine Entertainment reporting.

Figure 11 – Revenue and market share of media owners in the metropolitan and national newspaper market, 2020.



Source: Authors' own calculation based on companies' financial reports (2012, 2018, 2020).

Concentration in the digital news market

The digital market is now firmly established as a key platform for engaging with news and media. Traditional media organisations remain the most popular sources of news in the digital news market. As such, the dominance of particular players in the print and television markets directly influences the concentration of the online media market.

Over the past decade, people living in Australia have become heavy consumers of news online.¹¹⁴ Recent research clearly shows that Australians are engaging with news online — through a variety of digital platforms — at a rate much higher than radio and print, and only succeeded by television. However how the community accesses the news says little about the content they consume, or the sources of their news and information.

The Nielsen ratings — an audience measurement system operated by Nielsen Media Research — provide a clear picture of the most relevant news digital and print. While the digital market has enabled new and emerging media platforms to provide what seems to be an endless supply of alternative news and information, Australia echoes the prevalent trend in Europe, Britain, and the United States, of dominant media corporations controlling digital news offerings.

An analysis of online news consumption repeats the influence of the same dominant news corporations in the digital space. As you can see from the Nielsen ranking¹¹⁵ below, the second highest ranking is nine.com.au, followed by news.com.au, 7News, and the *Daily Mail Australia*. The digital offering from News Corp's *Herald Sun* also appears in the top 10. This demonstrates that two mastheads from News Corp reach a total audience of over 13.6 million and three mastheads from Nine reach a total audience of over 24.2 million, replicating the same concentration of ownership in the digital news space.

An analysis of online news consumption repeats the influence of the same dominant news corporations in the digital space



As you can see from the Nielsen ranking¹¹⁶ shown in Figure 12, the ABC retains the top position, while the second highest ranking is nine.com.au, followed by news.com.au. and 7News. News Corp's *Herald Sun* also figures in the top 10.

114 University of Canberra News & Media Research Centre. 'Digital News Report'. *University of Canberra*. (2019), p 26.

115 Nielsen. 'Digital Content Ratings: Top 10 Current Events and Global News December 2020'. *Nielsen*. (2020).

116 As above.

Figure 12 – Top 10 digital news ratings, December 2020.

Rank	Name	Unique audience	MoM%	UA change	Avg time spent session per person
1	ABC News Websites	11,410,639	-6.90%	0:42:51	11.6
2	nine.com.au	10,649,674	0.90%	0:23:32	7.8
3	news.com.au	10,428,199	-5.70%	0:36:02	11.4
4	7NEWS	9,438,706	-0.80%	0:07:27	5.6
5	smh.com.au	9,107,971	-11.10%	0:20:44	6.1
6	Daily Mail Australia	8,831,641	-4.90%	0:17:09	5.6
7	The Guardian	6,389,142	-4.80%	0:19:27	6
8	The Age	4,543,427	-6.90%	0:28:35	7.1
9	Australian Community Media Network	3,653,122	3.10%	0:05:12	3.2
10	Herald Sun	3,246,409	8.40%	0:16:19	4.8

Source: Nielsen, 2020.¹¹⁷

This information is consistent with the finding, highlighted by the ACCC Digital Platforms Inquiry Interim Report, focused on the concentration of media ownership — “print news, now print/online news, is particularly concentrated, with News Corp and Fairfax¹¹⁸ controlling 57.6% and 30.6% of the newspaper publishing market respectively. Seven West Media is the next largest publisher, with a 7.7% market share”.¹¹⁹ The significance of ownership concentration was noted in terms of market share and employment, with 68% of journalists employed in print or broadcast media organisations.¹²⁰

Local and regional newspaper markets

Australian local and regional newspaper markets are on the decline, a crisis well underway before the impacts of the COVID-19 pandemic accelerated newsroom closures throughout Australia. Between 2008 and 2018, 106 local and regional newspaper titles closed across Australia, a 15% decrease in the total number.¹²¹

117 Nielsen. ‘Digital Content Ratings: Top 10 Current Events and Global News December 2020’. *Nielsen*. (2020).

118 Fairfax was subsequently purchased by Nine Entertainment.

119 ACCC. ‘Digital Platforms Inquiry: Preliminary Report’. ACCC. (December 2018), p 251.

120 As above.

121 As above.

Approximately 5,200 journalism jobs have been cut in Australia between 2012 and 2020 alone.¹²² In 2020, News Corp carried out a massive restructure of its regional and metropolitan publishing divisions, resulting in hundreds of job losses,¹²³ while BuzzFeed closed its news operations in Australia, resulting in the loss of 40 jobs.¹²⁴ Further job losses are anticipated, as news businesses around the country deal with the economic impacts of COVID-19, and the government’s JobKeeper support for the sector concludes.

None of the local publications that were shut down were offering online-only versions, which left 21 local authorities — that originally had at least one local newspaper — without access to a dedicated local print publication for their area. Furthermore, a March 2021 decision by News Corp to cease distribution of eight of its mastheads, including *The Australian* and *The Courier Mail*, in much of regional Queensland leaves many communities without access to a daily newspaper covering state, national, and international affairs.¹²⁵ News Corp cited the “very high cost” of such distribution, despite a very real cost on communities in need of accurate and reliable news.



News Corp now controls the majority of local and regional newspaper titles in Australia

News Corp now controls the majority of local and regional newspaper titles in Australia. Figure 13 shows the analysis conducted by the ACCC¹²⁶ highlighting both the declining number and progressive concentration of newspaper titles in the regional market.

122 Warren, C. ‘2020 was a record year for journo job losses. What comes next?’. *The Conversation*. (15 December 2020).

123 Doran, M. ‘News Corp to cut jobs in restructure towards digital-only community and regional newspapers’. *ABC News*. (28 May 2020).

124 McDuling, J. ‘BuzzFeed to cut local jobs in global restructuring’. *The Sydney Morning Herald*. (29 January 2019).

125 Grounds, E. ‘News Corp Australia to stop distributing newspapers to much of regional Queensland’. *ABC News*. (29 March 2021).

126 ACCC. ‘Digital Platforms Inquiry: Final Report’. ACCC. (June 2019).

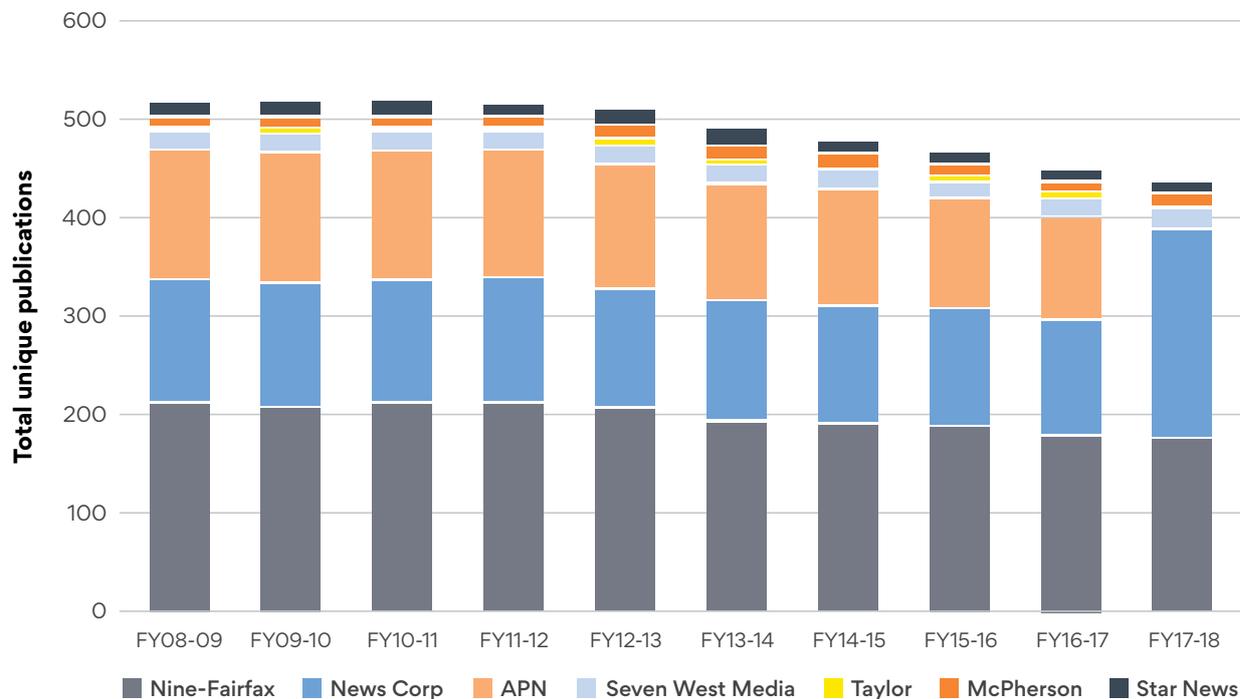


The Daily Mercury stopped printing in May 2020, leaving no local media for those living in Mackay to access. As a former journalist I desperately need a newspaper to start my day. My local newsagent keeps past copies of The Courier Mail and The Weekend Australian or me, but on the other days I read OLD newspapers! Shows how desperate I am. With The Daily Mercury now only available online, local politicians can now get away with murder. No-one knows about community events. Local Mackay businesses no longer have exposure, no advertising. No-one is telling our stories. Older people who do not use the internet are lost and angry — they don't even know who has died in the community.

On top of that, radio news is mostly Brisbane-centric, national, or international — Mackay rarely rates. Facebook is the closest thing to a daily newspaper we have but, again, the older age group misses out.”

Diana – Mackay, QLD.

Figure 13 – Total number of unique local and regional newspapers from 2008-09 to 2017-18, by major media company.



Source: ACCC, 2019.¹²⁷

The pool of newspaper titles at the local and regional level continues to shrink, with a decrease of 15% between 2008 and 2017 alone.¹²⁸ At the same time, the disturbing impacts of media concentration are being particularly exacerbated within local communities, where access to news is already limited.

Local communities are finding it more and more difficult to access relevant and accurate news, stories and information about the places in which they live, love and work.

127 ACCC. 'Digital Platforms Inquiry: Final Report.' ACCC. (June 2019), p. 562.

128 ACCC. 'Digital Platforms Inquiry: Preliminary Report'. ACCC. (2018).

TELEVISION

Snapshot of key findings

- Four corporations currently dominate Australian television – News Corp, Nine, Seven Media Holdings, and Viacom
- News Corp earns 40% of television market revenues (subscription and advertising) – almost double the next biggest corporation, Nine Entertainment
- News Corp owns Foxtel – Australia’s only subscription broadcasting service. Foxtel reaches only 30% of the Australian population but achieves an 18% ‘all day’ average share
- Just three corporations – News Corp, Nine, and Seven Media Holdings – collect 80% of Australian free-to-air and subscription television revenues
- Just two corporations – Seven Media Holdings and Nine – own a 75% average share of the commercial audience
- Agreements between regional and metropolitan broadcasters extend programming dominance of the already powerful metropolitan networks
- Content deals – like that of Foxtel’s Sky News broadcasting on free-to-air multi-channels in regional Australia – further entrench the influence of powerful media bodies

Audience: who’s watching?

Metropolitan television markets are the largest in terms of audience and revenue. In total, regional markets have a potential, total audience of just over half the collective metropolitan population.

Two commercial networks dominate the television audience market, with Seven capturing 38.5% and Nine capturing a 37% average share of the total commercial audience – noting that this excludes public service broadcasters and subscription television. The third network, Ten, operated by Viacom, achieved an average share of 25%.¹²⁹ The three networks provide 13 of the 22 free-to-air primary and multi-channel services available in metropolitan areas. The two public service media organisations, ABC and SBS, provide the other nine services.¹³⁰

Figure 14 shows the average audience share for free-to-air and subscription television in the five major metropolitan markets. It includes the evening, prime-time audience share (6pm to midnight), the ‘all-day’ share figures for the 22 free-to-air multi-channels and an aggregated figure for subscription television. In 2020, four corporations (Seven, Nine, Ten and Foxtel) captured three-quarters of the Australian television market.

129 KPMG. ‘Explanatory Statement to shareholders, and Independent Expert’s Report.’ *Ten Network Holdings Limited*. (10th October 2017)

130 OzTAM. ‘Consolidated Metropolitan FTA Share of Viewing 5 City Share Report - Free to Air Only Week 01 - Week 52 2020 (29/12 - 26/12) 18:00 - 23:59 Total Individuals - including Guests.’ *OzTAM*. (2020).



February 24, 2021. Broadcaster and publisher Nine Entertainment has reported a 79% gain in first-half earnings. Photo credit: AAP Image/Luis Ascui.

Figure 14 – Australian television (free-to-air and subscription television) – metropolitan city audience share (‘prime time’ and ‘all day’).

Owner	Network	6pm-midnight	6am-midnight
Nine Entertainment Co	Nine Network	23%	22%
Seven West Media	Seven Network	23%	21%
Ten Network	Network Ten	15%	13%
News Corp	Subscription television (Foxtel)	15%	18%
	ABC	15%	18%
	SBS	7%	6%

Source: OzTAM, 2020;¹³¹ OzTAM, 2020.¹³²

Foxtel — in only 30% of homes — achieves a 15% audience share in prime-time, and 18% of the ‘all-day’ average share.¹³³ The supply of their multi-channel services means their programming is delivered to a substantial audience in regional Australia — their multi-channels capture almost a quarter of the regional television audience.¹³⁴ As a result of the programming and channel arrangements with regional television networks — Seven, Nine, Ten, and Foxtel — absolutely control the delivery of television content viewed by the Australian population.

131 OzTAM. ‘Consolidated Metropolitan Total TV Share of All Viewing 5 City Share Report - All Homes Week 01 - Week 52 2020 (29/12 - 26/12) 18:00 - 23:59. Total Individuals - including Guests’. OzTAM. (2020).

132 OzTAM. ‘Consolidated Metropolitan Total TV Share of All Viewing 5 City Share Report - All Homes Week 01 - Week 50 2020 (29/12 - 12/12) 06:00 - 23:59. Total Individuals - including Guests’. OzTAM. (2020)

133 OzTAM. ‘Consolidated Metropolitan FTA Share of Viewing 5 City Share Report - Free to Air Only Week 01 - Week 52 2020 (29/12 - 26/12) 18:00 - 23:59 Total Individuals - including Guests’. OzTAM. (2020).

134 RegionalTam. ‘Consolidated Regional Survey Share Total Regional East Coast Share Report - Free to Air Only Week 07 - Week 52 2020 (09/02 - 26/12) 18:00 - 23:59 Total Individuals - including Guests’. RegionalTam. (2020).

Figure 15 shows the regional free-to-air television network audience share for 2020. The commercial television networks hold an average of 75% of the regional audience share in the prime-time viewing period of 6pm to midnight.¹³⁵ This includes the audiences for the broadcasters' primary channels and multi-channel services. Regional broadcasters have agreements with the metropolitan broadcasters to 'retransmit' the metropolitan multi-channels.

Figure 15 – Australian free-to-air television: 2020 regional audience share (prime time).

Owner	Network	6pm-midnight
Prime Media Group Ltd	GWN7, PRIME7, 9 WA	30%
Southern Cross Media Group Ltd	Southern Cross Television) Southern Cross TEN, 9	27%
WIN Corporation Pty Ltd	WIN, 9 (WA), Tasmania, Western Zone; 7HD	18%
	ABC	17%
	SBS	8%

Source: Regional TAM, 2020.¹³⁶

Further free-to-air market concentration

The potential for further market concentration remains. For example, in 2019 the Australian Competition and Consumer Commission (ACCC) stated it would “not oppose Seven West Media’s (ASX: SWM) proposed acquisition of Prime Media Group”.¹³⁷ Although the proposed sale did not eventuate, due to the opposition of major shareholders in Prime Media,¹³⁸ it showed that the new media laws cannot prevent a situation where a single media entity could own all five metropolitan television licences and a large number of regional television licences (18 across Australia in this instance), as well as owning the only major print media outlet in a capital city (*The West Australian*).

135 As above.

136 RegionalTAM. ‘Consolidated Regional Survey Share Total Regional East Coast Share Report - Free to Air Only Week 07 - Week 52 2020 (09/02 - 26/12) 18:00 - 23:59 Total Individuals - including Guests’. *RegionalTam*. (2020).

137 Digital platforms inquiry: final report’. ACCC. (June 2019)

138 Mason, M. ‘Stokes puts stake in the ground in Prime battle’. *Australian Financial Review*. (19 December 2019).

In March 2021, Australian Community Media owner Anthony Catalano purchased a 20% interest in Prime Media Group.¹³⁹ Given Australian Community Media has over 150 regional news outlets¹⁴⁰ — digital and print — and Prime Media has 13 regional television licences,¹⁴¹ the deal is a further concentration of Australia’s regional media ownership. The situation is even more complicated by WIN Television — 21 television licences, two radio licences — owner Bruce Gordon’s 12% stake in Prime and his 14.9% interest in Nine (five metropolitan television licences).¹⁴² There are reports Seven West Media is still interested in buying Prime¹⁴³ and that Nine and WIN are interested in a revised affiliation deal.¹⁴⁴

With the ongoing push for corporate mergers and deals and flimsy regulation, the potential is for Australia’s six metropolitan and regional free-to-air television businesses to be further reduced to possibly just three or four.

Subscription television

Subscription television services are delivered via satellite, cable and increasingly streamed online. Since the first subscription television in 1995, Australia has seen a range of providers¹⁴⁵ with three corporations emerging as the main pay television operators in Australia: Foxtel, Optus Vision in metropolitan areas, and Austar in regional Australia.

In 2005, Optus and Foxtel reached an agreement where Optus would supply Foxtel content, indicating that the pay television market, “apart from a couple of very small operators... [was] subdivided into two exclusive submarkets, each served by a single supplier of the same programming... creat[ing] a virtual national monopoly”.¹⁴⁶ In 2012, Foxtel also acquired regional operator Austar,¹⁴⁷ making it the major subscription television operator in both the metropolitan and regional markets. The same year, News Corp bought out the previously owned PBL Enterprises’ 25% shareholding in Foxtel and in 2018, through a merger of FoxSports and Foxtel, increased its overall stake in Foxtel to 65%.¹⁴⁸

139 Samios, Z. ‘Antony Catalano grabs controlling stake in Prime Media Group’. *Sydney Morning Herald*. (9 March 2021).

140 Ward, M. ‘Catalano stalks Prime Media’. *Australian Financial Review*. (9 March 2021).

141 ACMA. ‘Australian Communications and Media Authority (ACMA) Communications Report, 2018-19’. ACMA. (2020)

142 ACMA. ‘Media interests snapshot’. ACMA. (2020).

143 Ward, M. ‘Catalano stalks Prime Media’. *Australian Financial Review*. (9 March 2021).

144 Samios, Z. ‘Antony Catalano grabs controlling stake in Prime Media Group’. *Sydney Morning Herald*. (9 March 2021).

145 Cunningham, S, & Scarlata, A, ‘New forms of internationalisation? The impact of Netflix in Australia’ *Media International Australia*, 177(1). (2020), pp 149-164.

146 Papandrea, F & Tiffen, R. ‘Who owns the world’s media? : media concentration and ownership around the world’. *Media Ownership and Concentration in Australia*. (2016), pp. 703-739

147 News Corp. ‘News Corp Financial Report 2012’. *News Corp*. (2012), p 13.

148 ‘Foxtel brings television to Australians like never before.’ Foxtel. (n.d.)

Based on News Corp's published average revenue per (broadcast) user (ARPU) data, Foxtel earned just under \$500 million per quarter¹⁴⁹ and an estimated \$2 billion in 2020 from its broadcast subscribers.¹⁵⁰ In little over a decade, News Corp, through its ownership of Foxtel, has gained almost a total dominance of cable and satellite content broadcasting in Australia, controlling a market of over 2 million subscribers¹⁵¹ (and over 5 million weekly viewers).¹⁵²

Video-on-demand

After the ABC launched Australia's first broadcast video-on-demand service in 2008, the commercial sector soon followed. In 2020, the three commercial broadcast video-on-demand services — 7Plus, 9Now, and 10 Play — had a combined 7.4 million viewers.¹⁵³ While less than the public service media services (ABC iView and SBS Demand), commercial broadcast video-on-demand more than doubled viewing rates between 2019 and 2020.¹⁵⁴

Distinct from the free-to-air commercial broadcast video-on-demand service, a number of media organisations launched subscription video-on-demand services. The major global player in subscription video-on-demand, Netflix, launched in 2015. Australian subscription video-on-demand viewing has increased significantly since.¹⁵⁵

However, the cable and satellite subscription market had been substantially rationalised since 2012 to a single player: News Corp-owned Foxtel. With the development and launch of online, sports-oriented Kayo and general content provider Binge, Foxtel has extended its content business to online platforms, including subscription video-on-demand. By December 2020, Kayo had 624,000 paying subscribers and Binge had 431,000, making a combined total of 1.1 million subscribers.¹⁵⁶ In terms of viewers, News Corp's Foxtel — including Kayo, Binge, and Foxtel Now — grew by over 40% and Nine's Stan by 46% in 2020.¹⁵⁷ While both trailed Netflix's 17 million viewers, Foxtel and Stan were watched by over 12 million Australians.¹⁵⁸

149 Samios, Z. 'Antony Catalano grabs controlling stake in Prime Media Group'. *Sydney Morning Herald*. (9 March 2021).

150 News Corp. 'News Corporation reports second quarter results for fiscal 2021'. *News Corp.* (2021)

151 As above.

152 OzTAM. 'Consolidated National Subscription TV Share and Reach. National Share and Reach Report - Subscription TV Homes only Week 05 2019 (27/01/2019 - 02/02/2019) 06:00 - 23:59 Total Individuals - Including Guests'. *OzTAM*. (2020).

153 As above.

154 As above.

155 Roy Morgan. '8.6 million Australians are now watching 'Broadcast Video on Demand' such as 7plus,9Now, 10 Play and ABC iView'. *Roy Morgan*. (28 January 2021).

156 Cheik-Hussein, M. 'Kayo, Binge bring in subscribers for Foxtel'. *AdNews*. (5 February 2021).

157 As above.

68 158 Roy Morgan. 'Roy Morgan Readership results for the year ending December 2020'. *Roy Morgan*. (2020).

While News Corp has not published ARPU data for their online platforms, it is estimated that the platforms' annualised revenue is approximately \$240 million, based on published rates and subscriber numbers. The combined estimated revenue for Foxtel is \$2.24 billion.

Television is controlled by four major corporations, with News Corp reaping the biggest share of the combined free-to-air and subscription television market and controlling Australia's only subscription broadcast service.

Television — free-to-air, subscription television broadcasting and on-demand viewing — is the most-watched media in Australia and “despite [a] decline, live free-to-air broadcast television remains the most watched of any type of content”.¹⁵⁹

Free-to-air and subscription television broadcasting

Seven corporations hold all of Australia's free-to-air and major subscription television licences and four of them — News Corp, Nine Entertainment, SevenWest Media, and Viacom — dominate the market. Nine Entertainment, Seven West Media and Viacom dominate free-to-air television through their ownership of all five major, metropolitan licences, while News Corp control the subscription market through Foxtel. They control Australia's subscription broadcasting market unequivocally.

The seven corporations listed in Figure 16 hold all of Australia's 72 commercial free-to-air television licences. Three corporations control the 15 licences in the metropolitan city markets. These five metropolitan markets — with a combined population of over 16 million people — make up 65% of Australia's total population.¹⁶⁰ These metropolitan markets collectively generate almost 80% of free-to-air television advertising revenues (see Figure 16).

The three free-to-air networks holding television licenses in Australia's five mainland, metropolitan areas are Nine Entertainment, Seven Group Holdings, and Viacom (Ten). Following the deregulation of television ownership in 2017, these networks are no longer limited in market reach (the total potential audience they can acquire). These three networks dominate Australian television through their metropolitan licences and programming affiliation agreements.

News Corp's Foxtel is available via cable, satellite, and “over-the-top” services Kayo and Binge. Foxtel has approximately 3.3 million subscribers in metropolitan and regional Australia.¹⁶¹

159 ACMA. ‘Media interests snapshot’. *ACMA* (9 December 2020).

160 Based on a comparison of ABS Estimated Resident Population (ERP), 30 June 2019 and ABS, National, state and territory population, 30 June 2020.

161 News Corp. ‘News Corporation reports second quarter results for fiscal 2021’. *News Corp.* (2021)

Figure 16 – Australian major free-to-air and subscription television companies and broadcast services.

Company	Metropolitan	Regional Australia
News Corp	Subscription service: Foxtel. free-to-air retransmitted on Foxtel.	Subscription service: Foxtel. (free-to-air retransmitted on Foxtel. Foxtel channel, Sky News retransmitted on some free-to-air services)
Nine Entertainment Co. Holdings Ltd.	Nine Network	9, TEN Darwin
Seven West Media	Seven Network	7 Queensland (STQ), (Shareholder: GWN7, 9 WA (Geraldton, Kalgoorlie, SW & Great Southern), Prime 7 (Mildura, Northern & Southern NSW, Regional Victoria.)
Ten Network Holdings Ltd (Viacom CBS UK & Australia).	Ten Network	
WIN Corporation Pty Ltd.		WIN (Griffith/MIA, Mildura/Sunraysia, Mt Gambier, regional Queensland, regional Victoria, remote WA, Riverland, southern NSW, Tasmania(Geraldton, Griffith, MIA); 9 (Geraldton, Griffith/MIA, Kalgoorlie, Mildura/Sunraysia, Riverland, South-west & Great Southern (WA), Tasmania, Western Zone; 7HD (Griffith/MIA, Mt Gambier, Riverland)
Prime Media Group Ltd.		GWN7, PRIME7, 9 WA (Geraldton, Kalgoorlie, SW & Great Southern)
Southern Cross Media Group Ltd.		Southern Cross Television (Darwin, Broken Hill, Mt Isa, Tasmania, remote Australia), Southern Cross TEN, (Broken Hill, Darwin, northern NSW, Spencer Gulf); 9 (Broken Hill, Eastern Victoria, Regional Queensland, Southern NSW, Spencer Gulf, Tasmania, Western Victoria)

Source: ACMA, 2020.¹⁶²

Figure 17 – Australian commercial free-to-air and subscription television ownership and licence holders, 2020.

Owner	Main free-to-air television services	Location of owner	Main revenue sources	Licences: metropolitan	Licences: regional	Other major media
Nine Entertainment Co	Nine Network	Australia	Advertising, licensing programs, channels	5	3	Sydney Morning Herald, The Age, TEN Darwin
Seven Group Holdings Ltd	Seven Network	Australia	Advertising, licensing programs, channels	5	1	Prime, The West Australian
Viacom CBS Inc.	Ten Network	US	Advertising, licensing programs, channels	5		TEN
WIN Corporation Pty Ltd	WIN	Australia	Advertising		22	
Prime Media Group	GWN7, PRIME7	Australia	Advertising		13	
Southern Cross Media Group Ltd	Southern Cross Television	Australia	Advertising		18	Southern Cross Radio
Owner	Subscription television	Location of owner	Revenue	Licences		Other major media holding
News Corp	Foxtel	US	Subscription/ advertising, licensing programs, channels	Subscription Television Broadcasting licence		See also print, online digital and radio sections of this report

Source: ACMA, 2020.¹⁶³

Commercial television revenues

Television revenue provides a critical way in which to understand the depth of media concentration in the sector. Commercial free-to-air television’s revenue is principally derived from advertising, mainly on broadcast services, and with a small but increasing proportion coming from broadcast and video on demand advertising — see Appendix 2

for a breakdown of broadcast and video on demand advertising revenue. In addition, the main free-to-air broadcasters derive significant income from the ‘on-selling’ of their programs and entire channels to regional, affiliated broadcasters. In 2015-16, the last year when ACMA broadcasting financial reports were made available, total free-to-air television revenues were \$4.17 billion.¹⁶⁴

Subscription television’s main revenue is from subscriber payments, with some additional income from advertising — estimated subscription revenues amount to almost 90% of Foxtel’s income, with advertising accounting for just over 10%.¹⁶⁵

Television revenues were consistent for a number of years until 2020. COVID-19 critically impacted revenues in the second half of FY 2019/20 — advertising revenue decreased by 22% compared to the previous financial year.¹⁶⁶

Figure 18 – Commercial television revenues by company: 2012, 2018, 2020.

Ownership	Main service (channel)	\$'000	\$'000	\$'000
News Corp	Foxtel			2,240,000
Nine Entertainment Co Holdings Ltd (incl Stan)	9 Network	1,185,564	1,529,441	1,194,100
Seven West Media	7 Network	1,262,400	1,265,000	1,041,900
Viacom, Ten Network Holdings Ltd	Network 10	728,000	680,300	602,000*
Southern Cross Media Group Ltd		249,300	201,900	169,500
Prime Media Group Ltd	Prime /7Qld	249,211	219,158	163,680
WIN Corporation Pty Ltd ¹⁶⁷	WIN, 9 (WA), Tasmania, Western Zone; 7HD	n.a.	225,000	200,000
Total		3,674,475	4,120,799	5,611,180

Source: Authors own calculations based on financial reports of relevant media organisations.

*2020 figures are for 2019/20 financial year, except for Ten Network. The Ten Network revenue figure is estimated for 2020 based on Ten’s actual revenue reported for calendar year 2019 (Samios, 2020) and on reports of television industry analysis for 2020 of 0.1% increase compared to 2019 (Gillezeau, 2020).

164 ACMA, ‘Annual Reports 2016-17’. ACMA. (2017).

165 News Corp. ‘News Corporation reports second quarter results for fiscal 2021’. *News Corp.* (2021)

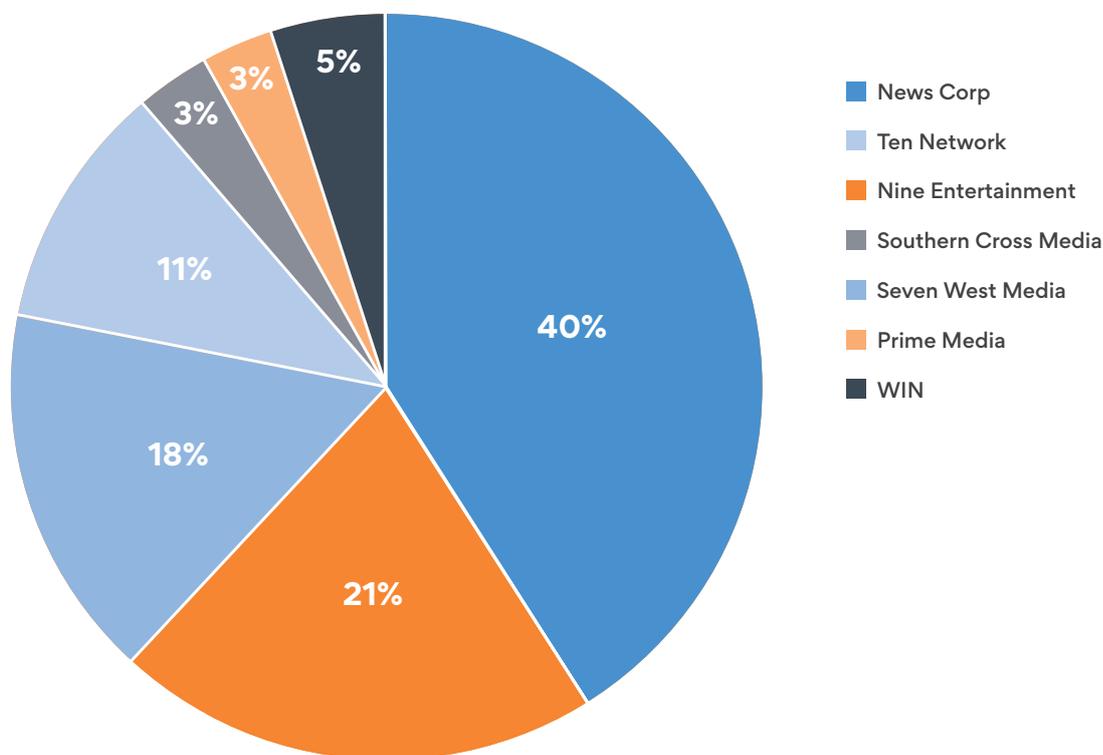
166 ThinkTV. ‘Total TV market records \$3.4 billion in ad revenue for FY 2019-20’. *ThinkTV.* (5 August 2020).

167 This estimate is based on historical ACMA BFR reports and more recent Think TV regional advertising revenue data.

The revenue generated through the metropolitan markets dwarfs that of the regions. As the data shows, the regional sector’s combined revenue fails to meet that of even the smallest metropolitan broadcaster, Viacom (Ten). Similarly, News Corp’s sole service, Foxtel, has an estimated revenue of \$2.24 billion for News Corp’s Foxtel revenue, almost double that of Nine, the largest commercial free-to-air service.

News Corp earns 40% of the total revenue in the combined free-to-air television advertising and subscription television subscription and advertising market, almost double that of the next biggest corporation, Nine Entertainment. Three corporations, News Corp, Nine and Seven, collect almost 80% of Australian free-to-air and subscription television revenues (see Figure 19).

Figure 19 – Free-to-air and subscription television corporate revenue, 2020.



Source: Authors own calculations based on financial reports of relevant media organisations.

Nine and Seven West Media’s dominance of audience share has led to their economic dominance of the free-to-air sector.

When the contrasting annual revenues of the metropolitan and regional operators are analysed in the context of Appendix 2, the market domination of the metropolitan free-to-air services, especially Nine and Seven, is clear. When this data is further analysed in the context of News Corp’s Foxtel service, the dominance of the three corporations is even clearer.

Metropolitan free-to-air dominance of regional programming

In addition to the Seven, Nine and Ten network dominance of metropolitan markets their “programming is also made available in regional markets through affiliation agreements with the regional television licences controlled by Prime Media Group Limited, Southern Cross Media Group Limited (Southern Cross), WIN Corporation Pty Ltd (WIN) and Imparja Television Pty Ltd”.¹⁶⁸ Affiliation agreements include specific program content licences — for *A Current Affair* and news programs — and whole channel deals for network multi-channels. For example:

- Southern Cross/NBN in northern New South Wales broadcasts Nine Network channels, Go, Gem, and 9Life
- WIN broadcasts Network Ten channels, Bold and Peach.¹⁶⁹ WIN also broadcasts the Foxtel subscription channel, Sky News, as Sky News on WIN.¹⁷⁰
- Prime broadcasts Seven channels, 7TWO, 7mate and 7flix.¹⁷¹

The regional channel arrangements provide the metropolitan networks and Foxtel’s Sky News access to another third of the Australian population.

168 ACMA. ‘Australian Communications and Media Authority (ACMA) Communications Report, 2018-19’. *ACMA*. (2020), p 30.

169 RegionalTAM. ‘Consolidated Regional Survey Share Total Regional East Coast Share Report - Free to Air Only Week 07 - Week 52 2020 (09/02 - 26/12) 18:00 - 23:59 Total Individuals - including Guests’. *RegionalTam*. (2020).

170 As above.

171 As above.

RADIO

Snapshot of key findings

- Just three corporations now dominate Australian metropolitan radio, controlling almost 100% of the main, metropolitan markets (38 of 40 licences)¹⁷² They are News Corp — including ARN and related interest, Nova — Southern Cross Media Group, and Nine Entertainment.
- Four networks have an estimated 80% of market revenue and 60% of the audience share in Sydney, Melbourne, Perth, Brisbane, and Adelaide.¹⁷³
- In less than a decade, increased ownership concentration had sharply reduced the number of major radio companies operating in Australia. Five corporations accounted for an estimated 93% of radio market revenue in 2020.

Since the 1980s, increasing deregulation in the Australian radio media market has enabled greater ownership concentration, especially in regional areas. This has led to a small number of corporations acquiring more outlets and networking their programming. This networking of content not only mirrors the trends in print and online news, but as it involves many of the same corporations, the same content is broadcast on different platforms and outlets. This amplifies the dominance of the most powerful players, reducing the ability for minority players to have a voice on radio.

Commercial radio broadcasting

Just three corporations dominate the Australian metropolitan commercial radio market:

- News Corp (Nova, Australian Radio Network)
- Southern Cross Media Group (Southern Cross Austereo)
- Nine (Nine Radio)

They control of 40% of Australia's 274 commercial radio licences¹⁷⁴ and hold 38 of the 40 broadcasting licenses in the most lucrative markets — Sydney, Melbourne, Brisbane, Adelaide and Perth.¹⁷⁵

172 Includes joint ventures.

173 'GFK Radio Surveys 8 (2020) - Metro Markets - September 20 to November 28'. *GFK*. (2020).

174 ACMA. 'Australian Communications and Media Authority (ACMA) Communications Report, 2018-19'. ACMA. (2020), p 29; ACMA. 'News in Australia: diversity and localism News measurement framework'. ACMA. (2020).

These mainland capital cities dominate Australia’s radio market, with almost two-thirds of the country’s population (most lucrative markets). As a result, the metropolitan radio market holds a majority share of all Australia’s radio market revenue, accounting for almost 70% of total radio revenue.¹⁷⁶

The major radio networks and owners, with cross-media interests, are listed in Figure 20. See Appendix 3 for a complete list of radio network owners.

Figure 20 – Main Australian radio broadcasting companies and licences (metropolitan and regional).

Analogue (AM and FM) and digital radio networks/services	Owner	Licences: metropolitan	Licences: regional	Licences
Southern Cross Austereo	Southern Cross Media Group Ltd	10	78	88
Australian Radio Network Pty Ltd	News Corp (HT&E)	12	1	13
Nova Entertainment Pty Ltd	Lachlan Murdoch	9	1	10
Nine Radio	Nine Entertainment Co	7		7
6IX, regional radio	Grant Broadcasters	1	52	53
Super Radio Network	Broadcast Operations Pty Ltd	1	37	38
ACE Radio	ACE Radio Broadcasters		13	13
Resonate Broadcasting	Resonate Broadcasting Pty Ltd		10	10
Campbelltown C91.3 FM, Wollongong i98FM	WIN Corporation Pty Ltd		2	2
Major radio licence holders (total licences 274)		40	194	234

Sources: ACMA, 2020.

* Includes joint ventures. Table shows the 234 licences controlled by these nine companies. The other 40 licences (to reach the total of 274 radio licenses in Australia) are owned by smaller companies.

News Corp owned and associated networks operate in each state capital city and in Canberra. Nine has services in Sydney, Melbourne, Brisbane and Perth. Southern Cross Media broadcasts in each state capital city, and via regional networks.

176 These are authors own calculations based on Broadcasting Financial Results reports by ACMA (2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016)

177 ACMA. ‘Australian Communications and Media Authority Communications Report, 2018-19’. ACMA. (2020), p.34.

Audiences: who's listening?

Commercial radio audiences in Australia increased by over 20% in 2020.¹⁷⁸

Four radio networks — Nine Radio, Australian Radio Network (News Corp), Nova (News Corp associated) and Southern Cross Austereo dominate audience ratings in the major cities. Between them, they capture almost 60% of the total radio audience share in Sydney, Melbourne and Perth, and over 60% in Brisbane and Adelaide.¹⁷⁹

Figure 21 – Australian major free-to-air radio companies and broadcast services.

Company	Metropolitan	Regional Australia
Australian Radio Network (HT&E, News Corp)	Adelaide (2 services), Brisbane (2), Canberra (2), Melbourne (2), Perth (2), Sydney (1), Western Suburbs Sydney (1).**	1 regional licence: Katoomba NSW.
Nova (Lachlan Murdoch)	Adelaide (2 services), Brisbane (1), Melbourne (2), Perth (1), Sydney (2).**	1 regional licence: Gosford, NSW.
9 Radio (Nine Entertainment Co)	Brisbane (2 services), Melbourne (2), Perth (1), Sydney (2).	68 regional licences: Canberra (2), Hobart (2), NSW, Queensland, SA, Victoria, WA.
Southern Cross Media Group	Adelaide (2 services), Brisbane (2), Melbourne (2), Perth (2), Sydney (2).	
WIN Corporation Pty Ltd.		2 regional licences: Campbelltown, Wollongong NSW.

Sources: ACMA, 2020;¹⁸⁰ ACMA, 2020¹⁸¹

** Includes joint ventures with Southern Cross Austereo (104.7 & Mix 106.3) and Nova Entertainment (Nova 93.7 & 97.3fm).

178 'Commercial radio metro ad revenue for 2019'. *CRA*. (2020).

179 'GFK Radio Surveys 8 (2020) - Metro Markets - September 20 to November 28'. *GFK*. (2020).

180 ACMA. 'Australian Communications and Media Authority Communications Report, 2018-19'. *ACMA*. (2020)

181 ACMA. 'Media interests snapshot (current at 9 December 2020)'. *ACMA*. (2020).

Radio revenue

Market revenues provide evidence and explanation for the concentration of media outlets over different markets. It is through control of the market — both in revenue and audience — that corporations can leverage excessive power and influence, in turn allowing them to extend to, and dominate, more markets. Media concentration is the process by which gradually fewer individuals and organisations exert this control.

As such, looking at revenue is key; in economic terms, media concentration entails excessive market power that distorts competition, generates structural inequalities of distribution of power, while the dominant institutions force all other smaller market competitors to be on their terms.

Concentration has always been a key feature of radio markets in Australia. The same four corporations (Southern Cross, HT&E, Nova and Nine) that dominate the market by audience, also control the majority of radio revenues. These corporations earned over 79% of total radio market revenues in 2020.

Figure 22 examines metropolitan and regional media corporation radio revenues in 2012, 2018 and 2020. The data shows that radio revenues have been consistent over a number of years until 2020.

Figure 22 – Commercial radio revenues by major corporations: 2012, 2018, 2020.

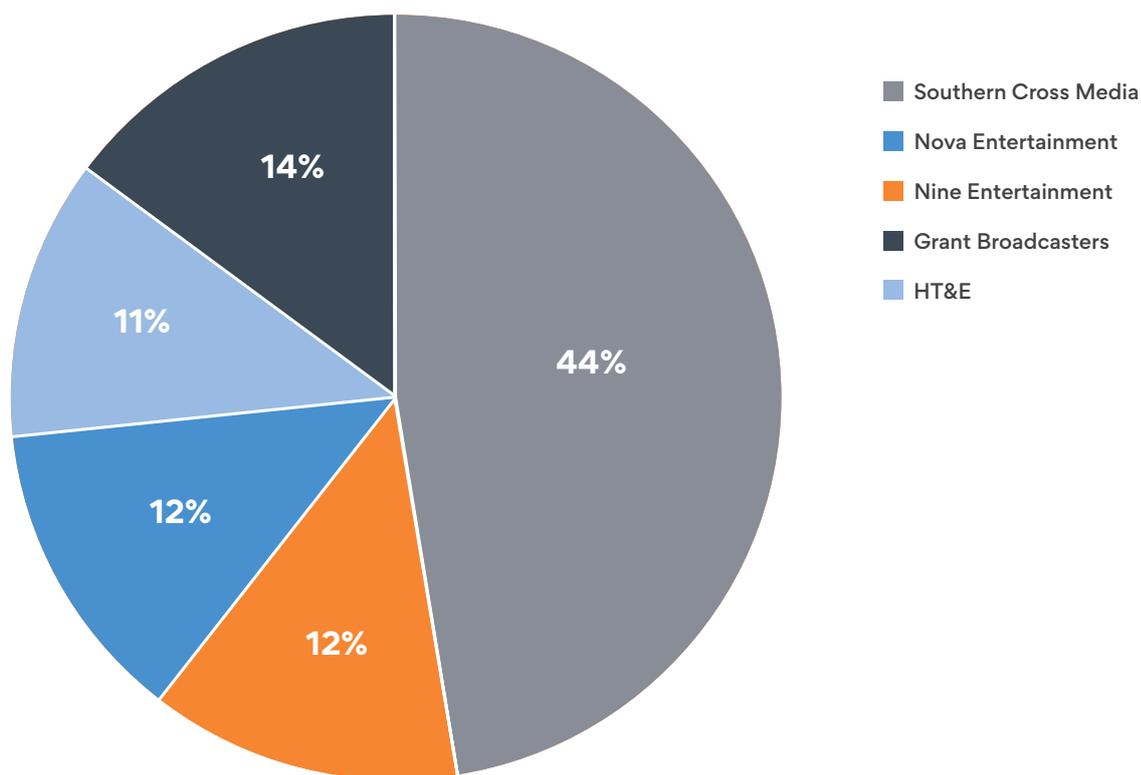
Radio revenue	2012	2018	2020
Major networks (Companies)	\$'000	\$'000	\$'000
Southern Cross Media Group Ltd	441,200	415,600	371,100
HT&E Limited (News)	140,000	235,500	93,000
Nova Entertainment Pty Ltd (News)*	150,000	211,000	100,000
Nine Entertainment Co Holdings Ltd	-	-	102,600
Grant Broadcasters Pty Ltd	66,000	105,947	116,000
Fairfax Media Ltd	97,164	0	-
Macquarie Radio Network Ltd	63,670	136,657	-
Prime Media Group Ltd	20,764	0	-
Other companies	91,202	87,296	58,300
Total	1,070,000	1,192,000	841,000

Sources: Authors own calculations based on financial reports of the above media entities for 2012, 2018, 2020.

*Nova revenue based on audience share, total revenue (ACMA, CRA) and media reporting of financial reports.

Southern Cross holds the major share of total revenue at 44%, while News Corp associated entities (Nova and HT&E) held 23%, Grant Broadcasters 14%, and Nine Entertainment, 12% — see Figure 23.

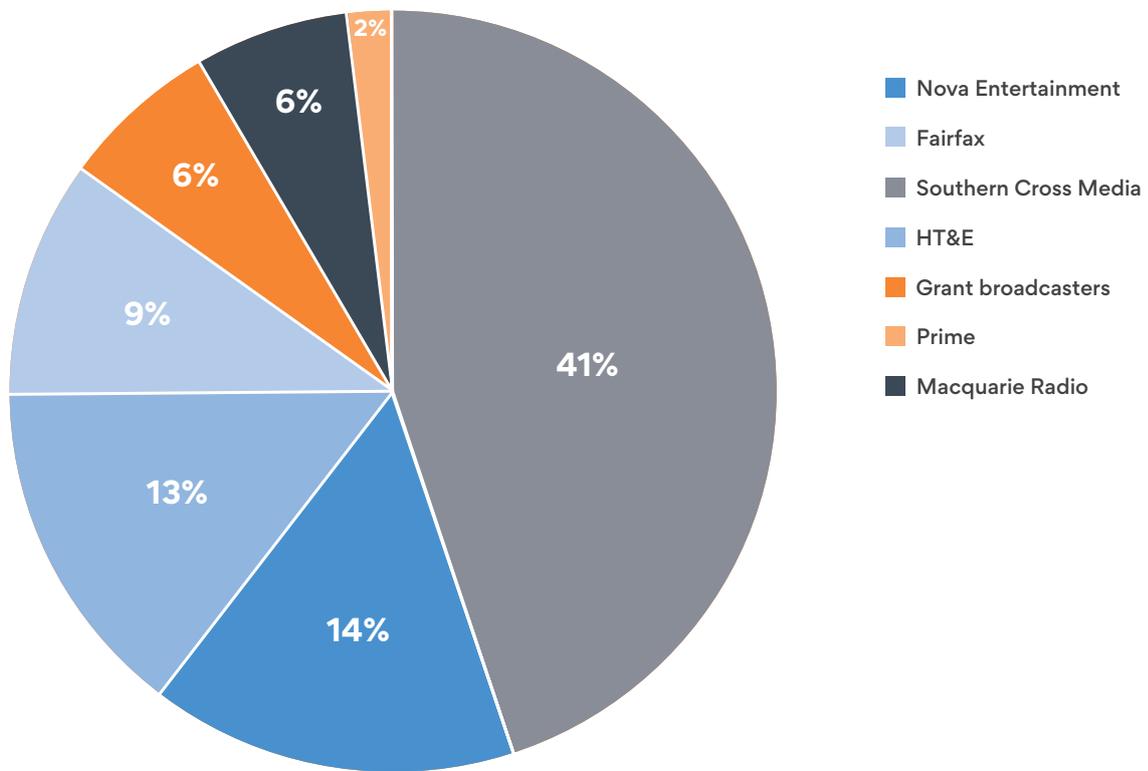
Figure 23 – Five main radio companies: estimated share of total commercial radio revenue, 2020.



Source: Authors own calculations based on company reports from 2020.

In less than a decade, increased ownership concentration had sharply reduced the number of major radio companies operating in Australia. Five corporations accounted for an estimated 93% of radio market revenue in 2020. This compares with seven corporations controlling an estimated 91% of radio revenue in 2012.

Figure 24 – Seven main radio companies: estimated share of total radio revenue, 2012.



Source: Authors own calculations based on company reports from 2012.

CONCLUSION

A vibrant and diverse media sector is a profoundly important part of any healthy democracy. However, here in Australia, the integrity and independence of our media is under a sustained attack.

This investigation exposes the disturbing impacts of media concentration on Australia's democracy. Through a comparative analysis of trends and market developments within our media sector, along with a rigorous overview of media diversity in Australia:

- It provides contextual and comparative information about why media ownership matters and its relevance for our democracy
- It delves into the complexities of media ownership structures that impact on the Australian public sphere and investigates data on readership shares, revenues, and power
- It clearly articulates exactly who owns Australia's media, and how media ownership disproportionately sets the public agenda
- It makes specific recommendations around the immediate actions that need to be taken if we want to safeguard Australia's democracy.

Right now, the Morrison Government has a critical opportunity to act in the interests of our community and our democracy — and not in the vested economic and political interests of powerful media corporations.

It is essential to a healthy democracy that currently unchecked media concentration by big media corporations and digital technology giants is reviewed and regulated in the best interests of everyday people living across the country. The role of the media in a democracy is an open and free press serving the public interest and holding power to account, but without urgent action Australia's media and the health of our democracy may never recover.

Without urgent action Australia's media and the health of our democracy may never recover.

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APPENDICES

Appendix 1

Methodology: list of data sources

- ACMA Communication reports over 2012-2019
- ACMA Media Interest Snapshots
- ACCC reports from the Digital Platforms Inquiry
- Emma (Enhanced Media Metrics Australia) Readership Data across newspaper and multiplatform brands — <http://emma.com.au/reports>
- GfK radio data surveying metropolitan ratings and average audience — <http://www.commercialradio.com.au/content/mediareleases/>
- Roy Morgan Research Australian Readership Results over 2012, 2018 and 2020
- Nielsen Reports relating to media and audience habits — <https://www.nielsen.com/au/en/solutions/digital-playbook/>
- OzTam consolidated audience data measuring metropolitan TV share — <https://oztam.com.au>
- RegTam (Regional Television Audience Measurement) consolidated audience data surveying regional TV share — <https://www.regionaltam.com.au>
- Reports, hearings and related transcripts from the Senate Select Committee on the Future of Public Interest Journalism
- The University of Canberra’s State of the Newspaper Industry Report (2013) and Digital News Report (2020)
- Annual reports, investor presentations, press announcements and financial forms over 2012 — 2020 from organisations including Fairfax Media, HT&E Limited, Macquarie Radio Network, News Corp, Nova, Nine Entertainment Corporation, Australian Community Media, PRIME Media Group, Southern Cross Media Group, Seven Group Holdings, Seven West Media, Southern Cross Austereo, Ten Network Holdings and ViaComCBS

Appendix 2

Commercial television revenues (2016-17 to 2019-20).

Source (Market)	Main services (channels/networks)	2016-17 \$ billion	2017-18 \$ billion	2018-19 \$ billion	2019-20 \$ billion
Metropolitan	7, 9, 10	2.9	2.9	2.7	2.3
Broadcast video-on-demand	7Plus, 9Now, 10 Play	n.a.	0.1	0.1	0.2
National/subscription	Foxtel	0.4	0.4	0.4	0.3
Regional	Prime, Southern Cross, WIN	n.a.	0.8	0.7	0.3
Total advertising revenue		3.7	4.2	4.0	3.4

Sources: Authors own calculations based on half-yearly financial data – including subscription advertising revenue – from Think TV Media Release (2016-17, 2017-18, 2018-19, 2019-20).

Appendix 3

Australian major free-to-air radio companies and broadcast services.

Company	Metropolitan	Regional Australia
HT&E (News Corp)	Adelaide, Mix 102.3, Cruise 1323, Brisbane, 97.3fm, 4KQ 693, Canberra, Mix 106.3, 104.7 Canberra, Melbourne, Mix 101.1, Gold 104.3, Perth, NOVA 93.7, 96FM, Sydney, KIIS 106**	ARN: Katoomba, The Edge 96.ONE. Western Suburbs Sydney, WFSM 101.7
Nova (Lachlan Murdoch)	Adelaide, NOVA 91.9, FIVEaa; Brisbane, NOVA 106.9, 97.3fm; Melbourne, NOVA 100.3, smoothfm 91.5; Perth, NOVA 93.7; Sydney, NOVA 96.9, smoothfm 95.3.	Gosford, Star 104.5
Nine Entertainment Co.	Brisbane 4BC, Magic 882, Melbourne 3AW, Magic 1278, Perth 6PR, Sydney 2GB, 2UE	
Southern Cross Media Group	Adelaide Hit 107, Triple M 104.7, Brisbane Triple M 104.5, Hit 105, Canberra Mix 106.3, Hit 104.7, Melbourne, Triple M 105.1, Fox Hit 101.9, Perth, Mix 94.5, Hit 92.9, Sydney Hit 104.1 2DAY, Triple M 104.9	Coffs Harbour Hit 105.5, Triple M 106.3; Dubbo Hit 93.5; Emerald Hit 94.7; Esperance TripleM 747AM, Hit 102.3; Geraldton Hit 96.5, 98.1 Triple M; Gold Coast SEA Hit 90.9, 92.5GOLD FM; Gosford SEA Hit 101.3, FM 107.7 2GO; Griffith Hit 99.7, Triple M 963AM; Hobart Hit 100.9, Triple M 107.3; Kalgoorlie Triple M 981AM, Hit 97.9; Karratha Hit 106.5, 102.5 Triple M; Katanning Triple M 1071AM, Hit 94.9; Kempsey Hit 105.1, Triple M 106.7; Kingaroy Hit 89.1; Mackay Hit 100.3, Triple M 98.7; Maryborough (Qld) Hit 101.9, Triple M 103.5; Merredin Triple M 1098AM, Hit 105.1; Mildura Hit 99.5, Triple M 97.9; Mt Isa Hit 102.5; Mt Gambier Hit 96.1, Triple M 104.7; Narrogin Triple M 864AM, Hit 100.5; Newcastle KO FM 102.9, Hit 106.9; Northam Triple M 864AM, Hit 96.5; Orange Hit 105.9, Triple M 105.1; Port Hedland Hit 91.7, 94.1 Triple M; Remote and Regional WA Hit WA, Triple M WA; Rockhampton Hit 107.9, Triple M 101.5; Roma Hit 95.1; Shepparton Hit 96.9, Triple M 95.3; Toowoomba/Warwick Hit 100.7, Triple M 864AM; Townsville 103.1, 102.3 4TO FM; Wagga Wagga Hit 93.1, Triple M 1152AM; Warragul Hit 94.3. Regional WA Hit WA, Triple M WA; 105.1, Triple M 106.7
WIN Corporation Pty Ltd.		Campbelltown C91.3 FM, Wollongong i98FM
Grant Broadcasters Pty Ltd	Perth 6IX	Ballarat Power FM, 3BA; Bega Power FM, 2EC; Bundaberg 4BU, HITZ FM; Burnie SEA FM, 7BU; Cairns STAR 102.7FM, 4CA AM; Canberra 2CA, 2CC; Darwin Hot100, MIX 104.9; Devonport SEA FM, 7AD; Geelong K-ROCK, Bay FM Gold Coast 102 Hot Tomato Goulburn Eagle FM, 2GN; Gympie ZINC 96.1 Hobart 7HO FM; Ipswich River 94.9fm; Launceston Chilli FM, LAFM; Mackay STAR 101.9FM, 4MK AM; Maryborough (Vic) EASYMIX; Mildura EASYMIX; Murray Bridge Power FM, 5MU; Muswellbrook Power FM, 2NM; Nambour HOT 91.1; Nowra Power FM, 2ST; Port Lincoln MAGIC FM, 5CC; Queenstown 7AUS, 7XS; Riverland MAGIC FM, 5RM; Rockhampton ZINC 927, 4RO AM; Scottsdale SEA FM, 7SD; Spencer Gulf North MAGIC FM, 5AU; Townsville STAR 106.3FM, ZINC 100.7; Wollongong WAVEFM
Super Radio Network (Broadcast Operations Pty Ltd)	Sydney 2SM	Armidale, FM100.3, 2AD; Broken Hill 2BH, Hill FM, Coffs Harbour 2HC, Dubbo ZOO FM, 2DU; Grafton FM 104.7, 2GF; Gunnedah Triple G, 2MO; Gympie 4GY, Inverell GEM FM, 2NZ; Kempsey Radio 531 AM, Lismore 2LM, ZZZ FM; Moree NOW FM, 2VM; Mudgee Real FM, 2MG; Murwillumbah Radio 97 AM, Newcastle NEW FM, 2HD; Orange 2EL, Parkes ROK FM, 2PK; Tamworth 2TM, FM92.9; Taree Max FM, 2RE; Toowoomba/Warwick 4AK,4WK; Young 2LF, ROCCY FM.
Resonate Broadcasting		West FM Charleville, Charters Towers, Hot Country Radio Dalby, Emerald, 4GC Charters Towers, 4HI Emerald, Queensland, Outback Radio 4LG Longreach, 4LM Mount Isa, West FM Longreach, 4SB Kingaroy, 4VL Charleville, 4ZR Roma, Queensland.

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