This is best printed in colour as it contains colour coded graphs

Impact of budget cuts and increasing advertising on SBS in primetime

A submission to the Senate Select Committee into the Abbott Government's Budget Cuts

SBS - the worlds first multicultural broadcaster - is a vital link in engaging culturally and linguistically diverse people in the Australian multi-culture but its efficiency in Charter adherence was and will be further challenged directly proportional to advertising increases

Save Our SBS Inc

I was and still am extremely disappointed that SBS has chosen to place advertisements in program. I ... ask that it is restricted to between programs. I choose not to watch commercial television because of the prevalence of ads and sadly, am now choosing to not watch SBS either for the same reason. As a public broadcasting service I feel strongly that you should be offering programming WITHOUT in-program ads. Do not lower the standards of SBS to that of the commercial channels.

**** Postcode above: 2088

SBS occupies a unique place within the Australian media and it is integral to its Charter that it maintains a position that is free of commercial interference or influence. It is imperative that SBS removes in-programme advertising, both to fulfil its commitments to its Charter, and to maintain a quality service to its viewers, who value the diversity and excellence of the service that it strives to offer.

**** Postcode above: 3040

I am a long-time strong supporter of SBS and it pains me to say this, but since the introduction of in-program breaks and the reduced diversity of programs in prime time I watch SBS a lot less. And I stopped watching films since SBS began including commercial breaks. The inclusion of add breaks in films is particularly disruptive and totally appalling.

Save Our SBS Inc PO Box 2122 Mt Waverley VIC 3149 A0051182D ph: 03 9008 0644 www.SaveOurSBS.org SaveOurSBS@SaveOurSBS.org



To The Senate Select Committee into the Abbott Government's Budget Cuts

10 December 2014

EXECUTIVE SUMMARY

Save Our SBS is concerned about the decision of the Abbott government to cut SBS funding and the proposal to increase advertising by averaging and product placement^I.

ADVERTISING IMPACTS ON CHARTER

The on-air effect is that in the medium to long term in primetime and sports broadcasts, every hour from 6 pm until 12 midnight SBS television will disrupt programs with 14 minutes of commercial breaks (10 minutes of advertisements plus 4 minutes of promos). SBS currently broadcasts about 4 minutes of promos plus 5 minutes of advertisements per hour. Whilst advertising content is restricted under the SBS Act 1991, promo duration is not.

Two major studies were conducted in the period since SBS introduced in-program advertising, one in 2008 ^{II} (n = 1733) and the other in 2013^{III} (n = 2044). NITV was not included in either study. These studies are particularly relevant in the current environment. The data in the pages that follow is lifted from those studies.

Both studies were the only studies specific to SBS on advertising, Charter compliance, languages other than English (LOTE) programming, Codes of Practice, and related matters.

The studies required participants read SBS's Charter in order to answer specific Charter related questions. The outcome of the different study groups was virtually the same. Three-quarters (71.6% in 2008 and; 72.1% in 2013) of SBS viewers nationally said that SBS was less faithful to the Charter since it had introduced in-program advertising (see graph on pg 7).

Anything that threatens SBS Charter adherence is a bad thing.

The findings of the studies strongly suggest SBS will be less efficient if there were an increase in advertising. Conversely SBS would adhere more closely to the Charter if in-program commercial breaks were removed – as it was until late-2006. However, the Communications Department Efficiency Study^{IV} effectively proposes an outcome that will not make SBS more efficient at Charter compliance.

The Efficiency Study, which focused on monetary savings, acknowledges that an increase in advertising *"risks to the amount of Charter-related content"* (pg 85 Efficiency Study).

The introduction of in-program advertising caused – and by definition it must – the advertiser to become the client of SBS. This is because the sole purpose of TV advertising is to on-sell audiences to the client, i.e., to the advertiser. The viewer is merely the product to be on-sold to the advertiser. Before the SBS's commercialisation, the viewer was the client. Any increase in advertising will only further elevate the advertiser as the client, instead of the viewer. This directly impacts on Charter adherence.

The Efficiency Study acknowledges the shift of viewer to advertiser as client: "there will be a greater pressure on SBS management to consider the trade-off of delivering on commercial expectations, against delivering those functions described in the SBS Charter" (pg 85).

In late 2006 with the discovery of a 'loophole' in the law, SBS introduced in-program advertising in television programs. SBS reinterpreted the phrase "*natural program breaks*" in the SBS Act 1991 to enable the insertion of commercial breaks in and throughout programs. Prior to that, breaks had only been between programs except on rare occasions such as the half time natural break of a soccer match. Immediately following the decision to introduce in-program advertising, SBS received complaints^V but did not act. A public petition^{VI} to the Minister sought a return to limiting breaks to between programs only. Community concerns were expressed in a number of forums ^{VII VIII IX X}. Three SBS amendment bills^{XI XII XIII} were introduced but never put to a vote, to phase out in-program advertising on SBS.

We encourage the perusal of the data and graphs on the pages that follow

If the proposal to increase advertising via averaging or product placement eventuates, SBS will suffer far greater losses than monetary losses and that will be forever.

BUDGETARY CUTS

In industry circles, SBS has always been regarded as lean and very efficient with revenues far lower than any other Network. However, the Efficiency Study attempted to compare costs, not revenues (except for advertising) to industry using the IBIS World Industry Report J5621 but the detail of the IBIS Report was insufficient and the Study stated *"a direct like-for-like analysis between the study's breakdown of costs and the average industry cost calculated by IBIS world was not possible"* (pg 27). Although the makeup of the \$53.7m cuts is provided, without an industry comparative category-by-category breakdown of expenditure/revenue it is not possible to comprehend how the government arrived at specific reductions. Three sets of official advertising revenues \$28.5m, \$40m to \$45m, and \$100m over five years muddle the truth. (Nat. Broadcasters to implement efficiency measures, 19/11/14; Minister's speech 19/11/14; Efficiency Study)

The conversation ought to be about restoring and requiring SBS cease in-program commercial breaks – not further commercialise it.

SBS should be applauded in the success of Australia as an inclusive and cohesive society. Its future role in this area is more important than ever but the two reductions in funding coupled with the proposal to increase advertising are problematic in the extreme. This changes the dynamic of any government commitment to multiculturalism and a socially cohesive society.

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QUANTITATIVE FINDINGS

(Extracts from the 102-page 2013 study)

The findings in this section were derived from the answers to the survey questions.

The old SBS back please. I loved the foreign language content and watch it far less now because it's no better than commercial stations with its annoying ad breaks. The in-program advertising has definitely influenced the content to the detriment of SBS.

**** Postcode above: 2515

KEY POINTS

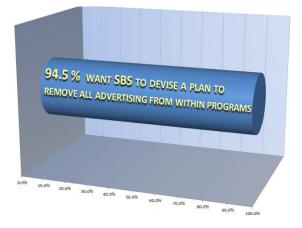
The key points were extracted from the data (questions 1 to 15) not the comments (question 16).

Numbers of participants

• The total number of genuine participants from real people was 2044 and no automated and robot (spam) entries were counted.

In-program advertising breaks

• 94.5% of the participants said they wanted "SBS to devise a plan to remove all advertising from within programs".



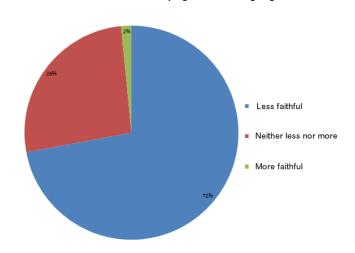
It is bad enough that SBS have compromised their independence to commercialism. It is worse that these ad breaks are shoved into programmes - so often directly against the tone and spirit of the programme.

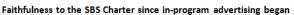
**** Postcode above: 5082

Charter adherence

A hyperlink was provided to the SBS Charter, and

- Almost three-quarters (72.1%) said that "since SBS-TV introduced in-program advertising, [SBS was] less faithful to the Charter now than it used to be", while
- One-quarter (26.4%) said it was "neither less nor more faithful to the Charter now than it used to be", and
- 1.6% said SBS was "more faithful to the Charter now than it used to be".





LOTE programming in prime time

- Slightly more than half (52.0%), wanted SBS ONE & TWO to broadcast "more foreign language programs" weeknights between 6pm and 11pm, but only
- 44.9% said "it is okay leave it as it is", while
- 3.1% wanted "less LOTE programs".

The original concept of SBS was to provide programs for our migrant population in their first languages, but I'm not convinced that all LOTE of our immigrant population are covered by SBS programming. I would like to see a greater range of languages presented on SBS and fewer English language programs - our other free-to-air channels are in English.

**** Postcode above: 3166

Control question – test of principle

Prior to the study, the empirical evidence was that the majority would hold high the principle that programs ought to be free of advertising breaks regardless of any consequences (e.g., a leaner service). To test that hypothesis – if the upholding of that principle was more, or less, important than the reported consequences (as self announced by SBS^{XIV}) – each participant was asked to make a very difficult decision, to either remove in-program advertising with the consequence of a nil expansion of SBS services and less local content, or to keep in-program advertising with the same (or possibly expanded) level of service. Due to the inbuilt conflict of interests within the question and its opposing outcomes, this question (5), not only tested the strength of the participants purported 1st principle – beyond their view 'I don't want in-program breaks' – but it also provides a guide to SBS as to the support or otherwise for any consequences arising from a difficult choice and whether or not SBS would have community support in that respect.

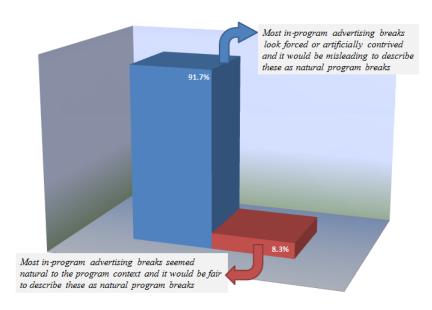
- 93.4% said they would opt to 'restrict advertising to between programs even if that meant little or no expansion of SBS and less local content', whereas
- 6.6% said they would prefer to 'keep the in-program commercial breaks (as it is now) with an expanded SBS and possibly more local content'.

Viewing experience

• 96.7% said they found "in-program commercial breaks disruptive and an impediment to their viewing experience".

Natural program breaks

- 91.7% said "most in-program advertising breaks look forced or artificially contrived and it would be misleading to describe these as natural program breaks", while
- 8.3% said "most in-program advertising breaks seemed natural to the program context and it would be fair to describe these as natural program breaks".



I find advertising on SBS to be intrusive on my viewing, a distraction, and they most certainly are NOT placed in 'natural beaks'. In essence, SBS has become just another commercial broadcaster, with no regard for its viewers and their wishes, tastes, likes and dislikes.

**** Postcode above: 6210

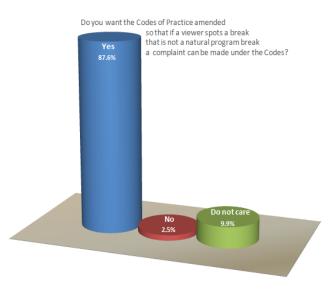
Commercial influence or interference

- 76.8% said they thought that "SBS is now subject to commercial influence or interference compared to how it was 10 years ago", while
- 2.7% believed it was not, and
- 20.5% said they were not sure.

SBS Codes of Practice

A hyperlink was provided to the Codes of Practice, and

- 87.6% said they wanted the "Codes of Practice amended so that if a viewer spots a break that is not a natural program break a complaint can be made under the Codes", while
- 2.5% did not want the Codes amended, and
- 9.9% did not care.



Moving in-program breaks to intra-program breaks

- 97.4% of those surveyed placed importance on "moving disruptive breaks out of SBS television programs (free-to-air & internet services)"
 - o (80.8%) said it was "very important", and
 - o (16.6%) said it was "somewhat important", but
- only 2.6% thought it "not important".

The 1991 legislators only ever intended that SBS place adverts top and tail of programs except in soccer.

SBS relevance

When asked how relevant SBS was-

- almost two-thirds (60.7%) said SBS was "less relevant now than before it introduced in-program advertising", while
- one-third (37.8%) thought SBS had "the same relevance now as before", and
- 1.5% said it was "more relevant".

Diversity

A link was provided to the SBS Charter. The participants were told of the Charter requirement that SBS *"contribute to the overall diversity of Australian television and radio services"* and convey how diverse SBS is or was over a period, and–

- 57.1% said SBS was "less diverse now compared to the years before advertisements were placed within programs", while
- 40.2% said it was "neither less nor more diverse now" compared to previously, and
- 2.7% thought SBS was "more diverse" since in-program advertising began.

Advertising, funding, Minister & Parliament

• Irrespective of funding, 95.1% of those surveyed said they did not support SBS "maintaining all commercial breaks in their current form"; and almost half wanted "increases in public funding withheld until SBS plans to move all advertising and promos from within programs to between them – like it used to be". Unrelated to funding, 92.1% said they would "approve if a Minister or Parliament required that SBS present television programs without commercial break disruptions (no in-program breaks), on free-to-air & internet services", and, 80.7% said they "strongly agreed" with the statement that "as a public broadcaster advertising ought to have no place on SBS but should be left to commercial broadcasters instead", while 13.6% said they "somewhat agreed", 1.9% "neither agreed nor disagreed", 2.7% "somewhat disagreed", but 1.1% "strongly disagreed".

I hardly watch SBS anymore because I can't stand the interruption of commercial breaks. Documentaries that are produced here for SBS have a sameness that makes them boring as they lead up to a contrived commercial break. You can see the artifice coming.

WHO PARTICIPATED IN THE STUDY?

The study was open to any interested person with internet access. Slightly more than one-third of the 2044 participants were not born in Australia nor were their parents. Half of the participants were born in Australia of Australian parents. The remainder were either Australian born of at least one parent not born in Australia or not born in Australia but at least one parent was Australian born.

Ads and commercial breaks in current form are highly disruptive to focused viewing and to degrade the quality of SBS's presentation. I am surprised that SBS management and board have not acted to restore that quality and reinstate the former level of committed viewing audience. If I want my viewing disrupted by ads I can go to commercial tv. If I don't, my option at present is the ABC. To my regret, SBS is losing me as audience.

**** Postcode above: 2482

QUALITATIVE BREAKDOWN BY CATEGORY

The study allowed people to write a comment if they wished. No directions or restrictions were given. A participant could write on any topic they chose, regardless of length or language.

Comments submitted were of varying but considerable length.

The most discussed topic by far, centred on the gross dislike of in-program breaks, that preference was given to advertisers over viewers. Overwhelmingly participants wanted advertising and promotional breaks restricted to 'between programs only'. This was the most commented topic. Slightly less than half of the most commented topic conveyed that SBS is 'too commercial – advertising and promos'. More than one-third of the topics commented on, either wanted no advertisements or were concerned about the types of advertising aired, not wanting 'hard sell and unethical' advertisements.

There is an inherent conflict of interest between impartial programming, and accepting paid advertising. That said, there is an argument that the paid advertisements also reflect a part of Australia's multicultural community, and thus should have a place in a multicultural broadcaster. However, interjecting slices of Australian commercial culture into the middle of other cultural programs is not just inappropriate, it is plain rude.

**** Postcode above: 2480

The table below shows the key topics that were identified by category with a level of importance – where 100 was the most frequently raised topic commented on, and 0.4 was the least discussed – as applied across all 717 submitted comments.

Category	Importance
In-program breaks are disruptive and destroy the viewing experience	100.00
Is too commercialised in presentation (advertisements & promos)	47.30
Opposed to advertising and/or kinds of advertisements broadcast (loud,	
hard sell, dumbed down, repetitive, unethical, ageist, sexist, offensive)	39.41
Reduction in overall quality of programs and fewer subtitled programs	24.06
Not enough foreign language films	12.44
Favoured advertising between programs	12.03
Grateful for or applauded the survey	9.12
On a path of self-destruction from short term commercial gain	8.71
Management out of touch, lost its way, degraded the service, panders to	
advertisers, reliance on advertising is fault of the Board	7.88
Not adhering to the Charter	7.05
Increase public funding	5.80
Dissatisfied with the survey	5.39
Blamed government & politicians under-funding SBS	4.97
In-program breaks- convenient for toilet breaks	3.73
Uncomfortable with question 5	3.31
NITV – in favour	1.65
Satisfied with SBS channels	1.65
SBS logo – disliked	1.65
NITV – disapproved	0.41
SBS2 (youth channel) – disliked	0.41
Other	< 0.40

APPENDIX 1

QUALITATIVE INDICATORS

The webform was designed so that a comment could not be submitted without answering all the questions as the comment was treated as a question, although optional. On submission, each comment and associated postcode was automatically separated from the (other) answers and personal details auto-removed from all answers. In order to avoid a comment thread or a conversation of a certain direction, no comment was published during the course of the study. Each comment was therefore unique and not influenced by other participants taking part in the study.

A total of 717 comments were submitted. The comments contained in the yellow boxes spasmodically throughout are a very fair illustration of the overall tone of, and the topics raised in, the comments submitted.

While the survey questions and answers supply direct statistical data, the comments are a qualitative assessment of the depths of the concerns that participants had and provide a good insight as to how people feel about SBS generally.

Comments submitted

The 75 pages comments section of the original (full length) study was removed for the short version of this Senate Select Committee submission.

The removed comments may be read in the original (full length) A study of 2044 viewers of SBS television on advertising, Charter, relevance and other matters.

I am really disappointed with the way that SBS has changed over the years with less multi-lingual content and the ads that drive me crazy! I had hoped that addressing these two issues would be the first 2 priorities when SBS acquired more funding [in 2012]. That ad free programs and less multilingual content are NOT their immediate priorities makes me wonder why I participated in the [2012] campaign [to increase public funds for SBS]! It's starting to feel like one-more-to-avoid commercial station!

Appendix 2

DATA 2013 STUDY



The online survey was open to any interested person with internet access. The total number of genuine participants from real people was 2044 and no automated or robot (spam) entries were counted. The (*figure* %) is the percentage of the 2044 surveyed while the (n = figure) is the total number of people who gave the answer cited. Links were provided to the SBS Charter, the Act, and the Codes of Practice in the questions that referred to them.

1) Do you want SBS to devise a plan to remove all advertising from within programs?

Yes	94.5%	n = 1932
No	5.5%	n = 112

2) How strongly do you agree or disagree with this statement: "As a public broadcaster advertising ought to have no place on SBS but should be left to commercial broadcasters instead".

I strongly agree	80.7%	n = 1650
I somewhat agree	13.6%	n = 277
I neither agree nor disagree	1.9%	n = 39
I somewhat disagree	2.7%	n = 56
I strongly disagree	1.1%	n = 22
87 8		

3) The SBS Charter begins "The principal function of the SBS is to provide multilingual and multicultural radio and television services. .." Since SBS-TV introduced in-program advertising, how faithful do you think it is to the SBS Charter?

Less faithful to the Charter now than it		
used to be	72.1%	n = 1473
Neither less nor more faithful to the		
Charter now than it used to be	26.4%	n = 539
More faithful to the Charter now than it		
used to be	1.6%	n = 32

4) Last year, in prime-time viewing weeknights between 6pm and 11pm, SBS-ONE had few programs exclusively or predominately in languages other than English (LOTE) and SBS TWO had a mixture. As the nation's multicultural broadcaster, do you think SBS ONE & SBS TWO should broadcast more foreign language programs in prime-time viewing than has occurred?

Yes	52.0%	n = 1063
It is okay — leave it as it is	44.9%	n = 917
No — less LOTE programs please	3.1%	n = 64

5) Imported and foreign language programs cost less than local content. SBS is bound by a Charter obligation that it broadcast programs in "preferred languages" and is exempt from the requirement placed on other TV networks to broadcast a quota of Australian content. SBS believe if there were no in-program commercial breaks, then there would be less local content and it would not be able to expand. Considering the foregoing, which one of the two choices below do you want SBS to implement?

Restrict advertising to between programs only (as it used to be) but with little or no expansion, possibly less local content and more imported and foreign language programs Keep the in-program commercial breaks (as it is now) and expand SBS,	93.4%	n = 1910
possibly with more local content and perhaps fewer imported programs	6.6 %	n = 134

6) Do you find the in-program commercial breaks disruptive and an impediment to your viewing experience?

Yes	96.7%	n = 1976
No	3.3%	n = 68

7) The SBS Act permits SBS to broadcast advertisements "before programs commence, after programs end or during natural program breaks". SBS believes it may place breaks within programs where one did not exist and all in-program advertising only occurs during natural breaks. Which one of the two statements below would you most strongly agree with as applying in the majority of cases to the placement of in-program advertisements in SBS television programs?

75
9

8) The SBS Codes of Practice used to allow viewers to lodge formal complaints if concerned that advertisements were broadcast in non-natural program breaks. SBS removed that provision with the advent of full in-program advertising and as a result, the industry regulator is no longer able to consider such matters. Do you want the Codes amended so that if a viewer spots a break that is not a natural program break a complaint can be made under the Codes?

Yes	87.6%	n = 1790
No	2.5%	n = 52
I do not care	9.9%	n = 202

9) Do you think SBS is now subject to commercial influence or interference compared to how it was 10 years ago?

Yes	76.8 %	n = 1570
No	2.7 %	n = 55
I am not sure	20.5 %	n = 419

10) How important is it to you that advertising and disruptive breaks be moved out of SBS television programs (free-to-air & internet services)?

Very important	80.8%	n = 165	1
Somewhat important	16.6%	n = 33	9
Not important	2.6%	n = 54	4

11) Since SBS-TV introduced in-program advertising, how relevant is SBS to you now?

Less relevant now than before	60.7%	n = 1240
The same relevance now as before	37.8%	n = 773
More relevant now than before	1.5%	n = 31

12) SBS is bound by a Charter requirement that it "contribute to the overall diversity of Australian television and radio services". Comparing now to the years before SBS placed advertisements within programs, how diverse do you believe SBS is?

Less diverse now	57.1%	n = 1168
Neither less nor more diverse now	40.2%	n = 821
More diverse now	2.7%	n = 55

13) Do you think increases in public funding ought to be withheld from SBS until it plans to move all advertisements and promos from within programs to between them – like it used to be?

Yes	47.7%	n = 974
No	29.7%	n = 608
I am not sure	22.6%	n = 462

14) No matter how much funding increases, SBS intends to maintain all commercial breaks in their current form. Do you support this?

Yes	4.9%	n = 101
No	95.1%	n = 3921

15) Would you approve if a Minister or Parliament required that SBS present television programs without commercial break disruptions (no in-program breaks), on free-to-air & internet services?

Yes	92.1%	n = 1883
No	2.9%	n = 60
I am undecided	4.9%	n = 101

My origin is:

Australian born of Australian born		
parents	50.0%	n = 1023
Australian born of at least one parent		
not born in Australia	14.0%	n = 286
Not born in Australia but at least one		
parent was Australian born	2.0%	n = 41
Not born in Australia and neither		
parents born in Australia	33.0%	n = 674
Unspecified	1.0%	n = 20
TOTAL	100%	n = 2044

ACT 3%n = 61, NT 1%n = 17, WA 8%n = 155, NSW 39%n = 806, VIC 22%n = 459, QLD 14%n = 285, SA 11%n = 226, TAS 2%n = 35 (TOTALs 100%n = 2044)

My Name (space required between your first & surnames): My Email Address * I Confirm My Email Address *

16) Any additional comments?

APPENDIX 3

DATA 2008 STUDY



This online one minute survey was about SBS. In addition to the nine multiple choice questions, participants were also asked for their post-code. The total number of people surveyed was 1733 participants.

1) In the past six months, how often did you watch SBS-TV?

16	0.92%	=	"A lot"
149	8.6%	=	"Somewhat"
618	35.7%	=	"Not much"
947	54.7%	=	"Never"

2) In the past six months, how often did you listen to SBS-radio?

1023	59.0%	=	"A lot"
484	27.9%	=	"Somewhat"
179	10.3%	=	"Not much"
44	2.5%	=	"Never"

3) Would you like SBS-TV to stop interrupting programs for commercial breaks?

1669	96.3%	=	"Yes"
64	3.7%	=	"No"

4) SBS-TV began interrupting programs for commercial breaks in late 2006. How frequently do you now watch SBS-TV compared to before, when there were no commercial break interruptions?

809	46.7%	=	"Less now than before"
497	28.7%	=	"Somewhat less now than before"
402	23.2%	=	"About the same now as before"
21	1.2%	=	"More now than before"

5) Do you want the government to legislate to prevent programs from being interrupted on SBS-TV?

1661	95.9%	=	"Yes"
72	4.1%	=	"No"

6) Given that SBS is a public, tax payer funded broadcaster, do you want SBS to be better funded from the public purse so that it is not reliant on advertising at all?

1682	97.1%	=	"Yes"
51	2.9%	=	"No"

7) Since SBS-TV became more 'commercial', how faithful do you think SBS-TV is to the SBS Charter?

1240	71.6%	=	"Less faithful to the Charter now than it used to be"
110	6.3%	=	"Neither less nor more faithful to the Charter now than it used to be"
8	0.5%	=	"More faithful to the Charter now than it used to be"
372	21.5%	=	"I am not sure"

8) Given that SBS was established as our multicultural broadcaster, do you think SBS-TV should broadcast more programs in languages other than English (LOTE) in prime-time viewing than it currently does?

96855.9%="Yes (more LOTE programs please): SBS should have more programs in languages other than
English during prime-time (evening) viewing"573.3%="It is now okay (leave it as it is): SBS should neither increase nor decrease the number of
programs that are in languages other than English during prime-time (evening) viewing"70840.9%="No (less LOTE programs please): SBS should have less programs in languages other than
English in prime-time (evening) viewing"

9) Do you want SBS to cease broadcasting advertisements completely?

1440	83.1%	=	"Yes"
293	16.9%	=	"No"

10) Any additional comments?

A State by State break down of participants:

- 618 were from *NSW/ACT*
- 10 were from NT
- 164 were from QLD
- 153 were from SA
- 25 were from TAS
- 274 were from VIC
- 100 were from WA
- 28 were from *elsewhere*

NOTE: The total number of genuine responses was 1733. The reason why the total percentage of responses to each question did not add up to the total of overall responses is because a small number of people did not answer every question and in the case of YES/NO answers a null response was treated as NO and in the case of Q8, a null response was treated as OK. There were seven bot responses out of 1733 participants. More than 99 percent of responses were genuine responses from real people.

REFERENCES

This was submitted to a Senate Committee and after publication by the Committee may appear on SaveOurSBS.org at:http://saveoursbs.org/wp-content/uploads/2014/12/Impact-of-budget-cuts-and-advertising-on-SBS.pdf

http://www.minister.communications.gov.au/ data/assets/pdf file/0003/63570/ABC and SBS efficiency report Redacted.pdf $^{
m v}$ Senate Estimates - 30/10/2006 – Communications & the Arts, - SBS, Mr Brown — "We have had phone calls of complaint, as we expected. My recollection is that in the first two days they were running at about 400 complaints overnight"

http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p:query=Id:%22committees/estimate/9768/0002%22

^{VI} Minister responds to petition, Save Our SBS, Tuesday, 26 August, 2008, (7,500 people objecting to in-program advertising, signed a petition to the Minister) http://saveoursbs.org/archives/316

🛿 NO ADS ON SBS & ABC: email campaign, Save Our SBS, Saturday, 24 November, 2007, (In 2007 1,119 people emailed politicians seeking more funding for SBS and legislative change to end disruptions into programs on SBS-TV) http://saveoursbs.org/archives/165

VIII Submissions to the ABC SBS Review, 13 March, 2009, DBCDE, (In 2008, more than one-thousand public submissions were made to the DBCDE ABC SBS Review. Of those that commented on the SBS only, almost all expressed the view wanting government to legislate to prohibit SBS from interrupting programs for commercial breaks)

http://www.archive.dbcde.gov.au/2012/may/abc sbs review/ submissions

^{1X} 2010 campaign statistics, Save Our SBS, Wednesday, 8 September, 2010, (In 2010 more than 15,400 had directly asked their parliamentarians to increase public funding for SBS so that it would be free from advertising, to amend the SBS Act accordingly, saying - an investment in SBS would be an investment in Australia's future cultural diversity) http://saveoursbs.org/archives/1545 Save Our SBS submission to the SBS Review, Save Our SBS, Monday, 8 March, 2010, http://saveoursbs.org/archives/998

XI Special Broadcasting Service (Prohibition of Disruptive Advertising) Amendment Bill 2008,

http://parlinfoweb.aph.gov.au/piweb/TranslateWIPILink.aspx?Folder=BILLS&Criteria=BILL_ID:s620%3BSEQ_NUM:0%3B

XII The Special Broadcasting Service Amendment (Prohibition of Disruptive Advertising) Bill 2009 (Bill Number 165/2009), http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22legislation%2Fbillhome%2Fs726%22

The Special Broadcasting Service Amendment (Natural Program Breaks and Disruptive Advertising) Bill 2012,

http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p:guery=Id:%22legislation/billhome/s863%22

xiv The specifics of the example (used in the survey at Q5) was based on that stated by SBS, 10 May 2010 to Save Our SBS and the generalities conveyed by the MD in numerous - Hansard Senate Estimates SBS 2006-2011

http://www.aph.gov.au/Parliamentary_Business/Hansard/Search?header_0%24ctl02%24SiteSearch=rbSite&ind=0&st=1&sr=0&g=SBS&ex pand=True&drvH=0&pnuH=0&f=01%2F01%2F2006&to=31%2F12%2F2011&pi=0&pv=&chi=5&coi=0&ps=100

When the 1991 Parliament incorporated the phrase "natural program breaks" into the SBS Act it intended the placement of advertising on SBS television would not disrupt programs, that SBS not present itself like a commercial broadcaster and that "natural program breaks" would be restricted to:-

- half-time in a soccer match . . . in effect what will happen is that advertising will top and tail programs • chamber/hansardr/1991-10-14/0051 Page: 1842 Mr SMITH (Liberal)
- natural program breaks, one would think that it is not too difficult to identify . . . clearly the half-time break in football and other sporting programs is a fairly common occurrence. The topping and tailing of programs so that good quality films are not massacred by advertisements is something that most people will readily identify with and recognise the breach of very quickly

chamber/hansards/1991-11-11/0109 Page: 2843 Sen ALSTON (Liberal)

- natural program breaks will be so unobtrusive on audiences as to be almost undetectable chamber/hansards/1991-11-11/0135 Page: 2862 Sen COLLINS (Labor)
- advertisement-at the beginning and the end of the sponsored program. In that way the viewers were not disturbed and • were not constantly interrupted, as is the case on some of the commercial television programs chamber/hansardr/1991-10-14/0060 Page: 1857 Mr LEE (Labor)
- let us not try to get the advertising revenue that will make the SBS another commercial channel. If we do, again, that will • change its character, and I do not think that is really what we are about chamber/hansardr/1991-10-14/0061 Page: 1860 Mr SINCLAIR (National)

¹ National Broadcasters to implement efficiency measures, 19 November 2014, The Hon Malcolm Turnbull MP, Minister for Communications,

http://www.minister.communications.gov.au/malcolm turnbull/news/national broadcasters to implement efficiency measures#.VGwq MMkXJZ5

^{II} One Minute Survey Results, Save Our SBS, Monday, 1 December, 2008, http://saveoursbs.org/archives/332

A study of 2044 viewers of SBS television on advertising, Charter, relevance and other matters, Save Our SBS, Tuesday, 23 July, 2013, http://saveoursbs.org/wp-content/uploads/2013/07/A-study-of-2044-viewers-of-SBS-television-on-advertising-Charter-relevanceand-other-matters.pdf ^{IV} The ABC and SBS Efficiency Study Report (redacted), April 2014, Department of Communications,