

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



TO: The Board of Directors of the Special Broadcasting Service Corporation

Dr Bülent Hass Dellal AO, SBS Chairman,
Locked Bag 028, Crows Nest NSW 1585

sent by email

2 April 2019

A submission to the SBS Board to consider creating a free-to-air LOTE channel

Preamble

This submission to the SBS Board of Directors is made pursuant to the *Special Broadcasting Service Act 1991* (SBS Act) noting that, under section:-

10(1) ***It is the duty of the Board:***

(g) ***to be aware of, and responsive to, community needs and opinions on matters relevant to the Charter.***

In this context, we ask you to consider our submission and please adopt the recommendations below.

Introduction

Save Our SBS Inc is the peak body for *supporters & friends of SBS* representing more than 80,000 persons from every Australian state and territory. We seek the Board's indulgence to consider the matters raised in this submission.

Overview

The data from studies cited in this submission if extrapolated to the entire Australian population are accurate to within a margin of error ranging from 1.2% to 2.8% with 95% confidence^{1,2,3}.

This submission is driven by community feedback and concern that programs spoken in languages other than English (LOTE) are severely deficient on Australian free-to-air television, and that a portion of the community is not adequately catered for due to this deficiency. In this regard, SBS is better placed to serve the needs of these communities than other media.

In years gone by, SBS fulfilled those in-language needs on a single TV channel^{4,5,6,7,8}. Over the past decade in particular, a considerable portion of the function to provide LOTE content was transferred to SBS On Demand. However, a significant number of viewers who know of SBS On Demand refuse to sign up to it or have but won't use it. This cohort are 'missing out'. No matter how user friendly On Demand is – even if no sign-in function were required – this group prefer, or in many cases will only watch free-to-air television anyway⁹.

Yet there are others who may or may not use On Demand but still desire to see LOTE programs “*in their language*” on free-to-air TV. They too are ‘missing out’.

Due to multi-channelling it is entirely feasible to create a LOTE channel, and in HD.

Inclusiveness leads to social cohesion and undoubtedly there is a need for a free-to-air LOTE TV channel with evidence of strong support from a significant portion of people who want SBS to create one. Furthermore, the diverse communities who want a LOTE channel are quite specific as to the format in which they want programs presented, desiring a relatively less commercial approach than currently occurs on all existing SBS free-to-air TV channels.

Of 1,176 viewers surveyed nationally in 2017, three quarters (71%) want SBS to establish a new free-to-air channel in which a very high proportion of primetime and other programs are exclusively or predominantly in LOTE (subtitled) – ‘LOTE TV’ – and more than three-quarters (78%) said it is important or moderately important that advertisements are only scheduled between programs – not in them – on such a channel¹⁰. However, if SBS determines that programs must contain advertisements, almost all (96%) stated that they did not want more than one commercial break in every program (in addition to the break between programs)¹¹.

The trend desiring more LOTE content – now leading to the conclusion that it is time for SBS to establish a dedicated LOTE free-to-air channel – has increased over time.

In 2013, only 44.9% of 2044 viewers surveyed nationally thought SBS had sufficient LOTE content in primetime¹².

LOTE programming may fall within the category (by those surveyed in 2018) as ‘niche programming’ and 70% of 1,249 viewers said there are insufficient niche programs on SBS¹³.

RECOMMENDATIONS

- ▶ **SBS create a new free-to-air channel that predominately schedules programs spoken in LOTE (subtitled in English); *and either***
 - ▶ **programs on the LOTE channel be presented without commercial interruption (i.e., advertisements are placed before and after programs only); *or***
 - ▶ **there be no more than one commercial break within any program (in addition to placing advertisements before or after programs) on the LOTE channel.**

LOTE channel fulfils Charter obligations

Very strong arguments in favour of SBS creating a free-to-air LOTE channel may be found under section 6 of the SBS Act, the *Charter of SBS*, which states (in order of justification):-

6(2) SBS “*must*”–

(e) *as far as practicable, inform, educate and entertain Australians in their preferred language*

(d) *contribute to the retention and continuing development of language and other cultural skills*

(c) *promote understanding and acceptance of the cultural, linguistic and ethnic diversity of the Australian people*

Considering that just under a quarter (21%) of all Australians speak a language other than English at home and there are over 300 languages spoken in Australian homes¹⁴, it is fair to say that irrespective of the Charter, about a quarter of the population are not catered for by free-to-air television whose output is English-centric. This void could easily be filled by an SBS free-to-air LOTE channel.

Retention of the language and cultural skills would be well served in the same manner given that nearly half (49 per cent) of all Australians were either born overseas (first generation Australian) or one or both parents were born overseas (second generation Australian)¹⁵. Much could be offered to this diverse cohort via an SBS free-to-air LOTE channel.

An SBS free-to-air channel scheduling programs predominately spoken in LOTE, will help Australian born audiences (culturally curious monolingual Australians) and those with a first language other than English accept and welcome the ethnic diversity of others – their cultures from afar, now living in Australia – seeing programs in LOTE from other countries. This will inform communities and help keep Australia safer against the rise of disturbing extremist groups.

However, there is strong evidence that all of the above could be undone if a LOTE channel adopts the same commercial format that is fairly universal across all SBS outlets. Given that the “principal function” of SBS requires it include “**all**” Australians (sub-section 1 of the Charter), this Charter requirement would not be met by SBS due to those that are alienated by the existing commercial format on a newly created LOTE channel.

In late 2008, a significant portion of 1,733 viewers from all states and territories self-reported their viewing habits of SBS had declined with the introduction of in-program advertising (which commenced two years earlier). Almost half (46.7%) said they were watching SBS ‘less than before it began interrupting programs for commercial breaks’ and just over a quarter (28.7%) said their viewing habits of SBS-TV were ‘somewhat less now than before SBS commenced

interrupting programs for commercial breaks¹⁶. The evidence is scant that this sub-cohort have subsequently returned to SBS, many having switched to non-commercial media, the ABC, feeling alienated by the SBS in-program advertising policy¹⁷. For others, SBS is no longer their first choice and tend to switch off or change channels at an ad break¹⁸.

More than half (55.9%) of those studied in 2008, wanted more LOTE content on SBS TV¹⁹.

The evidence of four periods – 2008, 2013, 2017, and 2018 – strongly suggests that a very high proportion of the four separate cohorts, totalling 6,202 viewers from every metropolitan and rural region nation wide, will not watch a LOTE channel if programs are to be presented using the same commercial format as currently applies to existing SBS outlets^{20,21,22,23,24}.

To fully satisfy SBS meeting its “principal function” to include “**all**” Australians, it is imperative that given the available evidence, a LOTE channel ought not disrupt programs for commercial breaks, or if it must, there be no more than one commercial break within every program (plus the break between programs), regardless of the program duration, this being a fundamental tenet^{25,26,27,28,29,30,31}. This format would provide the desired long-form focus for those who are currently ‘missing out’ and want a LOTE free-to-air channel. Under such a scenario, SBS would then satisfy the Charter obligation to include “**all**” Australians.

The MD who introduced in-program advertising to SBS in late 2006 said that if a channel were mainly to screen imported LOTE content, there would be no need for that channel to place commercial breaks within programs. Advertisements between programs only would suffice.

A LOTE channel like the one described in the recommendations box above that has a different commercial format from all existing SBS and other channels, would be a great opportunity for SBS to innovate, thus fulfilling another Charter obligation; that required under section 6(2)(h) of the SBS Act that, SBS:-

... contribute to extending the range of ... television ... services using innovative forms of expression.

Internationally, there are hybrid funded public broadcasters that provide, and in most cases initiated, at least one channel with a relatively less commercial format or a commercial-free channel, a world of difference from the same broadcaster’s own more commercial looking channels^{32,33,34,35,36,37}. This provides precedent for SBS to do the same with a LOTE channel.

Strategy

A LOTE free-to-air channel (and one that appears relatively less commercial than existing SBS channels) would go a long way to appeasing those who are currently ‘missing out’, due to content spoken in-language and a different (seemingly less commercial) presentation style.

If SBS were to create a LOTE channel as recommended, Save Our SBS would expect to see a shift away from the perception that SBS is ‘less faithful to the Charter now than it used to

be'. Upon reading SBS's Charter, three-quarters (72.74% on average) of three separate cohorts of SBS viewers totalling 4,953 viewers assessed SBS as perceived above. The studies were conducted in 2008, 2013, and 2017 with participants from most regions in every Australian state and territory. The three studies compared the then current period to pre-2006 (when SBS introduced in-program advertising)^{38,39,40,41}.

Given that a sizable portion of the community are not catered for in the manner that SBS once did, it makes much sense for SBS to now include this part of its potential audience and bring them back to the fold, bridging the language and culture divide of multicultural Australia. These people may be the biggest advocates of SBS if SBS provides them with a TV channel of the type they seek. Such good publicity can only help SBS in the long term.

Quotas

A LOTE channel would be one where SBS predominately schedules programs *spoken* in LOTE (not English). For clarification purposes *predominately* was said to mean:-

in primetime not less than 85% LOTE content (excluding news and sporting programs in LOTE), and at all other times not less than 65% LOTE content (including news and sporting programs in LOTE)^{42,43}.

SBS may impose its own targets but regardless, clearly the aim is for a LOTE channel to screen a very high amount of general LOTE content across the board, not passing off news and the occasional other LOTE program as the be all and end all of LOTE content.

Types of LOTE programs wanted

From 12 genres, the two most desired program types in peak viewing are foreign language movies (subtitled) scoring 77%, and foreign language TV series (subtitled) scoring 58%⁴⁴.

The precise scheduling mix is for SBS to determine, but based on community feedback⁴⁵, suggestions for LOTE TV are that programs in primetime ought to consist predominately of subtitled imported movies spoken in LOTE and subtitled imported television series spoken in LOTE. News bulletins spoken in LOTE from overseas broadcasters could be transferred to the LOTE channel scheduled for daytime time slots (not primetime) and subtitled in English.

Further to that above, sub-section 1 of the Charter requires SBS “**educate**” Australians. Whilst there are differing methods of educating (formal and informal), a LOTE channel with informed presenters introducing and concluding certain LOTE programs is definitely worth considering and would be a partial means of SBS meeting the Charter requirement to educate. A ‘live’ or ‘as-live’ presenter (speaking in English), introducing and concluding, for example, a movie of another language, not only would be a personal and warm means of communication, but would also impart knowledge across cultures in an Australian context and connect audiences with SBS in real-time on a human level, in a way that only live or as-live television can (an advantage that television has over catch-up services).

Similarly, a series of short, on-going, SBS/university/community partnered TV programs introducing basic English or directing immigrants to services, suitably placed on a LOTE channel, may be a means by which SBS can assist new arrivals improve their communication and other skills in navigating Australian society. This could be another means of SBS complying with the sub-section 1 requirement of the Charter to 'educate'. A channel that is predominately LOTE focused would be an opportune outlet for SBS to provide such service.

LOTE TV promotes social cohesion

Central to SBS since its inception, has been the well founded idea that inclusiveness leads to social cohesion and this has been repeated in the SBS Corporate Plan for years. Conversely, feelings of alienation can lead to isolation, disharmony and social disorder which may progress to extremism, expressed as hatred, at worst culminating in violent terrorist acts.

However, a powerful tool to avoid disharmony is to recognise and promote the languages and cultures of linguistically diverse communities on mainstream media, especially free-to-air television, scheduling movies and TV shows in-language (subtitled in English) from those countries. Such would normalise their lives, culture and languages within Australian society uniting all those who are 'missing out' across cultures.

The mere act of screening TV content in LOTE from a range of countries will culturally connect those born in Australia with immigrants and their families, one to the other, with a rich and deep understanding of each other. This is the very essence of what leads to a sense of belonging and informs social cohesion. A free-to-air LOTE channel as described will enable SBS to build understanding, inclusion and cohesion within the Australian polyglot society.

SBS has a role in assisting new arrivals resettle, broadening the cultural horizons of established Australians, and fostering social cohesion. The Scanlon-Monash Index of Social Cohesion 2007-2018 found a year-by-year average drop (bar one) below baseline, with an average total drop from 100 points at baseline in 2007 to 89.7 points in 2018⁴⁶. This Index based on research every year (bar one) over the eleven years, coincidentally begins with the introduction of in-program advertising and parallels the reduction of LOTE programs in primetime on SBS. Arguably, a dedicated LOTE TV channel as outlined will contribute considerably towards improving social cohesion in the medium to long term.

LOTE TV and SBS On Demand could complement each other. One ought not replace the other, even though each may attract different and overlapping demographics.

SBS's welcome initiative to now show Australian commissioned programs with subtitles in other languages is the flipside of the same coin for a new channel with global content predominately spoken in LOTE, subtitled in English, as proposed here for a LOTE channel.

It is worth remembering that SBS was established because neither the ABC nor commercial broadcasters were catering to ethnic communities in any meaningful way. A free-to-air LOTE channel as described is the missing link for SBS to re-connect with those who are currently 'missing out', and fits with the "*SBS - a world of difference*" slogan for an inclusive society.

Summary

A free-to-air channel that predominately schedules programs spoken in LOTE will:-

- 1) Permit SBS to include those individuals and communities who are not well served by existing free-to-air television.
- 2) Enable SBS to meet its Charter obligations under section 6(2)(c)(d)(e) of the SBS Act by ‘promoting acceptance of cultural, linguistic and ethnic diversities, retaining language and other cultural skills, and broadcasting content in preferred languages’ .

A LOTE channel as recommended with a different (relatively less intrusive) commercial format than currently occurs on all existing SBS channels will:-

- 3) Allow SBS to fulfil its Charter obligation under section 6(1) of the SBS Act, that requires SBS include “all” Australians by providing an acceptable service to those viewers who will not watch SBS due to its current commercial format.
- 4) Comply with the Charter under section 6(2)(h) of the SBS Act, ‘innovating’ with a different commercial format as described.
- 5) End community perception that SBS is not fully meeting its Charter obligations, and foster social inclusion by appeasing those who are currently ‘missing out’.

For the reasons outlined and in the public good, we request the Board fully implement that stated in the RECOMMENDATIONS box.

RECOMMENDATIONS

- ▶ **SBS create a new free-to-air channel that predominately schedules programs spoken in LOTE (subtitled in English); *and either***
 - ▶ **programs on the LOTE channel be presented without commercial interruption (i.e., advertisements are placed before and after programs only); *or***
 - ▶ **there be no more than one commercial break within any program (in addition to placing advertisements before or after programs) on the LOTE channel.**

Save Our SBS Inc

¹ Applies to SOSBS survey data results only. Calculated using the Relative Standard Error 'margin of error' (MOE), at 95% confidence. Greater samples have less MOE than smaller samples, e.g., extrapolating to a population of 25,233,034 residents, survey samples sizes of 6,202 = 1.27% MOE; 4,953 = 1.42% MOE; 1,249 = 2.83% MOE.
ABS, 30 August 2018, *Sample Size Calculator*,
<https://www.abs.gov.au/websitedbs/D3310114.nsf/home/Sample+Size+Calculator>

² WayBack Machine, ABS, 24 January 2019, *Population clock*, states the resident population of Australia at 25,233,034 people,
<https://web.archive.org/web/20190124121020/https://www.abs.gov.au/ausstats/abs%40.nsf/94713ad445ff1425ca25682000192af2/1647509ef7e25faaca2568a900154b63?OpenDocument>

³ Survata, *MARGIN OF ERROR RESOURCES*, Margin of Error Calculator, MOE = t/\sqrt{n} calculator,
<https://www.survata.com/market-research/resources/margin-of-error>

⁴ Television Au, 18 October 1980, THE HISTORY OF AUSTRALIAN TELEVISION, *Channel 0/28*, Kevin Sadlier, TV WEEK,
<https://www.televisionau.com/channel0.htm>

⁵ WayBack Machine, SBS, Wednesday 22 October 1997, schedule movies,
https://web.archive.org/web/19971021044239fw_/http://www.sbs.com.au/THIS_WEEK/weds43mov.html

⁶ The Age, Thursday 6 May 1982, television guide - Channel O (SBS), page 2,
<https://news.google.com/newspapers?nid=MDQ-9Oe3GGUC&dat=19820506&printsec=frontpage&hl=en>

⁷ The Age, Friday 11 June 1982, television guide - Channel O (SBS), page 2,
<https://news.google.com/newspapers?nid=MDQ-9Oe3GGUC&dat=19820611&printsec=frontpage&hl=en>

⁸ The Age, Monday 6 September 1982, television guide - Channel O (SBS), page 2,
<https://news.google.com/newspapers?nid=MDQ-9Oe3GGUC&dat=19820906&printsec=frontpage&hl=en>

⁹ SOSBS, *Survey 2017 about SBS*, 26 April 2017, APPENDIX B SBS On Demand comments, pages 52 to 60,
<https://saveoursbs.org/wp-content/uploads/2017/04/Survey-2017-about-SBS.pdf>

¹⁰ SOSBS, 26 April 2017, *Survey 2017 about SBS*, pages 3, 24,
<https://saveoursbs.org/wp-content/uploads/2017/04/Survey-2017-about-SBS.pdf>

¹¹ SOSBS, 26 April 2017, *Survey 2017 about SBS*, page 11,
<https://saveoursbs.org/wp-content/uploads/2017/04/Survey-2017-about-SBS.pdf>

¹² SOSBS, 23 July 2013, *A study of 2044 viewers of SBS television on advertising, Charter, relevance and other matters*, page 22,
<https://saveoursbs.org/wp-content/uploads/2013/07/A-study-of-2044-viewers-of-SBS-television-on-advertising-Charter-relevance-and-other-matters.pdf>

¹³ SOSBS, 12 June 2018, *Programs on SBS survey 2018*, page 7,
<https://saveoursbs.org/wp-content/uploads/2018/06/Programs-on-SBS-survey-2018.pdf>

¹⁴ ABS, 27 June 2017, Media Release, *Census reveals a fast changing, culturally diverse nation*,
<http://www.abs.gov.au/ausstats/abs@.nsf/lookup/Media%20Release3>

¹⁵ ABS, 27 June 2017, Media Release, *Census reveals a fast changing, culturally diverse nation*,
<http://www.abs.gov.au/ausstats/abs@.nsf/lookup/Media%20Release3>

¹⁶ SOSBS, 1 December 2008, *One Minute Survey Results*, answer to question 4,
<https://saveoursbs.org/archives/332>

¹⁷ SOSBS, 2008 COMMENTS ABOUT SBS, PDF pages 185 to 297,
https://saveoursbs.org/wp-content/uploads/2019/01/Comments_about_SBS_2008-2018.pdf

¹⁸ SOSBS, COMMENTS ABOUT SBS (2008 to 2018), PDF pages 1 to 297,
https://saveoursbs.org/wp-content/uploads/2019/01/Comments_about_SBS_2008-2018.pdf

¹⁹ SOSBS, 1 December 2008, *One Minute Survey Results*, answer to question 8,
<https://saveoursbs.org/archives/332>

²⁰ SOSBS, 1 December 2008, *One Minute Survey Results*, Q3,
<https://saveoursbs.org/archives/332>

²¹ SOSBS, COMMENTS ABOUT SBS, (2008 to 2018), PDF pages 185 to 297 (2008 COMMENTS ABOUT SBS),
https://saveoursbs.org/wp-content/uploads/2019/01/Comments_about_SBS_2008-2018.pdf

²² SOSBS, 23 July 2013, *A study of 2044 viewers of SBS television on advertising, Charter, relevance and other matters*, pages 11, and 23 to 97 (*In-program advertising breaks; APPENDIX 1 - Comments submitted*),
<https://saveoursbs.org/wp-content/uploads/2013/07/A-study-of-2044-viewers-of-SBS-television-on-advertising-Charter-relevance-and-other-matters.pdf>

²³ SOSBS, 26 April 2017, *Survey 2017 about SBS*, pages 9, 19, and 37 to 90 (*Impediment to viewer experience; SBS-TV compared to 20 years ago; Appendices A, B, C, D*),
<https://saveoursbs.org/wp-content/uploads/2017/04/Survey-2017-about-SBS.pdf>

²⁴ SOSBS, 12 June 2018, *Programs on SBS survey 2018*, pages 28 to 90 (*Appendix B comments*),
<https://saveoursbs.org/wp-content/uploads/2018/06/Programs-on-SBS-survey-2018.pdf>

²⁵ "The introduction of in program advertising to the SBS in effect makes the SBS a de facto fourth free-to-air commercial television station and serves to erode the fundamental tenets of public broadcasting..."
Senator CONROY Labor, 11 October 2007, *SBS issues* (email), PDF2,
<https://saveoursbs.org/wp-content/uploads/2009/06/sbs-2007-election-policy-sosbs-emails-to-from-s-conroy-original-messages.pdf>

²⁶ “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.”
Hansard Senate, 11 November 1991, *SPECIAL BROADCASTING SERVICE BILL 1991 Second Reading*, Senator ALSTON Liberal, page 2843,
<http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id:%22chamber/hansards/1991-11-11/0083%22>

²⁷ “Natural program breaks will be so unobtrusive on audiences as to be almost undetectable”
Hansard Senate, 11 November 1991, *SPECIAL BROADCASTING SERVICE BILL 1991 In Committee*, Senator COLLINS Labor, page 2862,
<http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id:%22chamber/hansards/1991-11-11/0109%22>

²⁸ “Half-time in a soccer match ... in effect what will happen is that advertising will top and tail programs”
Hansard House of Reps, 14 October 1991, *SPECIAL BROADCASTING SERVICE BILL 1991 Second Reading*, Mr SMITH Liberal, page 1842,
<http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id:%22chamber/hansardr/1991-10-14/0041%22>

²⁹ SOSBS, 26 April 2017, *Survey 2017 about SBS*, pages 9, 10, 11,
<https://saveoursbs.org/wp-content/uploads/2017/04/Survey-2017-about-SBS.pdf>

³⁰ SOSBS, 23 July 2013, *A study of 2044 viewers of SBS television on advertising, Charter, relevance and other matters*, page 11,
<https://saveoursbs.org/wp-content/uploads/2013/07/A-study-of-2044-viewers-of-SBS-television-on-advertising-Charter-relevance-and-other-matters.pdf>

³¹ SOSBS, 1 December 2008, *One Minute Survey Results, Q3*,
<https://saveoursbs.org/archives/332>

³² In 2005, frustrated by the commercial reality of having to set aside charter initiatives or consigning charter programmes to inhospitable places in the schedule, Television New Zealand's then Chief Executive, Ian Fraser, penned a memo titled *A More Public Broadcaster* to the board of the public broadcaster, TVNZ, saying that the broadcaster needed to provide at least one free-to-air TV network as a fully non-commercial network, like the ABC in Australia, charged with delivering charter values, or with a different commercial operation like Australia's then SBS (SBS was then was placing advertisements between programs only).
NZ Herald, 13 December 2005, *Chief outlines 'major problem' at TVNZ*,
https://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=10359765

³³ On 14 November 2006, TVNZ announced plans to launch two commercial-free channels and in 2008 the NZ Government declared that the public broadcaster, TVNZ, was to become “more public-service” like. TVNZ responded by launching two commercial free channels TVNZ 6 and TVNZ 7 yet retaining its main channel, TV-ONE, as a commercial channel.
WayBack Machine, Wikipedia, 2 February 2019, *TVNZ*,
<https://web.archive.org/web/20190202162700/https://en.wikipedia.org/wiki/TVNZ>

³⁴ Māori Television, is a hybrid funded public broadcaster with the main channel carrying advertising but since 2008 the second channel is free of advertising.
WayBack Machine, Wikipedia, 26 May 2018, *Māori Television*,
https://web.archive.org/web/20180526183321/https://en.wikipedia.org/wiki/M%C4%81ori_Television

³⁵ CBC Canada is a hybrid funded public broadcaster but advertising was discontinued on CBC's secondary radio network in 2016.
WayBack Machine, Wikipedia, 22 March 2019, *Canadian Broadcasting Corporation*,
https://web.archive.org/web/20190322110250/https://en.m.wikipedia.org/wiki/Canadian_Broadcasting_Corporation

³⁶ France Télévision is a hybrid funded public broadcaster but since 2009 it ceased broadcasting advertisements during primetime.
BFMTV, 13 January 2019, *La fin de la publicité en soirée sur France Télévisions n'a pas tenu ses promesses*,
<https://www.bfmtv.com/economie/la-fin-de-la-publicite-en-soiree-sur-france-televisions-n-a-pas-tenu-ses-promesses-1606382.html>

³⁷ RAI Italy is a hybrid funded public broadcaster that carries advertising on its primary channel(s) but as of 2016, three RIA channels – RAI 5, RAI Storia, and RAI Yo Yo – became fully non-commercial.
WayBack Machine, Wikipedia, 31 December 2018, *RAI*,
<https://web.archive.org/web/20181231074655/https://en.wikipedia.org/wiki/RAI>
Prima Comunicazione Online, 25 November 2015, *Rai elimina la pubblicità sui canali Yoyo, Rai 5 e Rai Storia. Lo annuncia sui social il presidente della commissione di Vigilanza, Roberto Fico*,
<https://www.primaonline.it/2015/11/25/220179/rai-elimina-la-pubblicita-sui-canal-yoyo-rai-5-e-rai-storia-lo-annuncia-sui-social-il-presidente-della-commissione-di-vigilanza-roberto-fico>

³⁸ Upon reading SBS's Charter, 72.60% (in 2008 n = 1,733), 72.10% (in 2013 n = 2,044) and 72.74% (in 2017 n = 1,176) said, 'SBS is less faithful to the Charter since it introduced in-program advertising' (see next three references below).

³⁹ SOSBS, 1 December 2008, *One Minute Survey Results, Q7*,
<https://saveoursbs.org/archives/332>

⁴⁰ SOSBS, 23 July 2013, *A study of 2044 viewers of SBS television on advertising, Charter, relevance and other matters*, page 12,
<https://saveoursbs.org/wp-content/uploads/2013/07/A-study-of-2044-viewers-of-SBS-television-on-advertising-Charter-relevance-and-other-matters.pdf>

⁴¹ SOSBS, 26 April 2017, *Survey 2017 about SBS*, pages 3 and 15,
<https://saveoursbs.org/wp-content/uploads/2017/04/Survey-2017-about-SBS.pdf>

⁴² Senate Environment and Communications References Committee: Inquiry into Australian content on broadcast, radio and streaming services (Submission 23), 9 February 2018, *Australian content on SBS and related matters*, (table: ANNUAL PROGRAM QUOTA RECOMMENDATIONS FOR SBS) pg 11,
<https://www.aph.gov.au/DocumentStore.ashx?id=401c3201-f1ec-430c-a28e-f01ffe9b3bca&subId=563554>

⁴³ SOSBS, 16 November 2018, *SBS & friends say 'fully-fund Australian content on SBS' senate committee told*,
<https://saveoursbs.org/archives/6394>

⁴⁴ SOSBS, 26 April 2017, *Survey 2017 about SBS*, pages 3 and 26,
<https://saveoursbs.org/wp-content/uploads/2017/04/Survey-2017-about-SBS.pdf>

⁴⁵ SOSBS, *COMMENTS ABOUT SBS*, (2008 to 2018), PDF pages 1 to 297,
https://saveoursbs.org/wp-content/uploads/2019/01/Comments_about_SBS_2008-2018.pdf

⁴⁶ Professor Andrew Markus, ACJC, Faculty of Arts Monash University, *Mapping Social Cohesion 2018: National Report*, Table 9, page 20 PDF24,
https://www.monash.edu/_data/assets/pdf_file/0009/1585269/mapping-social-cohesion-national-report-2018.pdf

A submission to the SBS Board to consider creating a free-to-air LOTE channel may be published at:-
<https://saveoursbs.org/wp-content/uploads/2019/04/A-submission-to-the-SBS-Board-to-consider-creating-a-free-to-air-LOTE-channel.pdf>