

The use of the synchronous facility in several regions would result in "mush" areas which would receive a distorted signal generally regarded as unusable, the Corporation submitted. If the application were granted then pressure would come from about 5 percent of the potential audience affected to provide further frequencies to give adequate reception to those living in the mainly rural mush areas.

The Corporation had plans to use 603 kHz for a proposed access and ethnic broadcasting service and the Corporation submitted the proposed use of the only allocated frequency to Auckland of 603 kHz was not the best use of the frequency in the public interest.

*Radio Pacific*—*Radio Pacific*, the holder of a sound radio warrant for Auckland also opposed the application on various grounds including:

- (1) It was not in the public interest for one minority appeal organisation to establish a nationwide network.
- (2) If the Tribunal were to grant the application it would face legitimate claims from other minority groups to set up similar national networks.
- (3) The introduction of a further service would result in over-fragmentation of the radio market.
- (4) The continual addition of further services would affect the economic viability of existing services.

Unlike Wellington and Christchurch where *Radio Rhema* already broadcasts, the Auckland radio market is served by 10 radio stations, including a part-time university station, and *Radio Pacific* which has no equivalent in other centres.

*Radio Pacific* submitted that even though the audience for *Radio Rhema* would be small it would increase the cost for an advertiser to reach a given number of listeners (cost per thousand). That would have an effect on the charges that could be made for advertising by the commercial stations and, thus, their income.

603 kHz was the last available AM frequency in Auckland. With the exception of 1ZB, the most successful stations had the worst frequencies. The grant of a good frequency to a minority group with minority programming did not constitute good frequency management.

*Radio Pacific* saw the application as not just an application for a warrant but an attempt by a religious minority to convert non-believers, using radio as the means to make contact. It was concerned about the nature of the counselling service as an evangelising agency for a particular interpretation of Christian faith.

*Radio Pacific* was concerned that, while FM broadcasting was being developed on a planned basis as a result of the Tribunal's FM report and the establishment of Government policy, for AM broadcasting the Tribunal had not had an opportunity of putting forward a future plan and had been required to treat applications as they came. Existing operators' futures were uncertain and they faced new regional private television, commercial YC, the development of FM and a number of other matters as well as competition with press and magazines which created such a state of flux that it was unreasonable to allow further competition at this time. The station called for some "breathing space" before the Tribunal granted further applications.

*Radio I*—*Radio I Ltd.*, the holder of another sound radio warrant in Auckland, raised objections relating to the ability and the integrity of the applicant referring to changes by way of formal applications to amend in relation to transmitter location and a change of policy from the proposed use of 603 kHz to being willing to accept any frequencies that might be made available to it during the hearing. It, too, expressed concern regarding the counsellor training.

*Radio I* pointed out that the applicant, if successful, would be able to reach the major urban populations of the larger centres from Whangarei to Christchurch, a position not enjoyed by any other private radio station, commercial or non-commercial. It would then undoubtedly move to fulfil its pledge to the people of New Zealand to establish a Christian radio network throughout New Zealand.

*Radio I* submitted that the fact that a warrant had been granted for Christchurch with relay stations in Wellington and Nelson, should create no weight or bias in favour of the applicant. It also urged the Tribunal not to give weight to the acquisition of a building as it was up to the applicant to take the risk involved in any such major acquisition.

*Radio I* had concerns regarding the siting of the transmitter and most as originally proposed in the application which would have affected *Radio I* but they were met by the change of site later proposed by the applicant.

It was submitted that the Auckland radio market was still unpredictable and unstable and there were proposals which would create further instability including the advent of a third television channel which would affect the commercial stations.

*Radio I* claimed the applicant was not just wanting to fill a need, it was proposing to develop as great an audience as possible.

A station's audience share was an asset which it has to market.

*Radio I* submitted that since *Radio Rhema's* application could not be deferred any longer, the Tribunal should disallow the application but it might direct dismissal of the application to be without prejudice to any further application that might be brought later in time. It submitted that the Tribunal would be justified in this course because there was work to be done concerning the allocation of frequencies and the Tribunal would later be able to take account of the effect on the Auckland market of a further AM warrant.

*Section 80*—In considering the application and before determining whether or not to grant the application, the Tribunal is required by *Section 80* to have regard to the following matters, so far as they are applicable:

- (a) The extent to which the proposed service is desirable in the public interest—

The applicant would provide an alternative broadcasting service which is not provided by existing AM or recently warranted FM operations and which would command a small but significant audience.

In considering the original application by *Radio Rhema* for the 3YG warrant in Christchurch the Tribunal observed that there was a section of the community which was interested in the presentation of programmes which are inoffensive, both as to message and music with an interlacing of religious or "Christian" music.

The station also provides a high proportion of New Zealand originated material, and broadcasts a number of BBC transcription service programmes which are of high quality and of interest to New Zealand listeners.

Evidence was produced that 70.3 percent of all New Zealanders gave allegiance to some Christian church and the applicant claimed a wide range of support which was detailed both in submissions and letters in support and in evidence that was given to the Tribunal. While it is clear that at a local level there has been individual and regional mainstream church support, only the Presbyterian Church gave any support at national level. A number of churches which attract a much smaller percentage of support in the community did give their national endorsement to *Radio Rhema*.

While criticism was made that the programming did not provide denominational broadcasting we do not consider that to be a disadvantage. Undoubtedly part of the success of *Radio Rhema* is the freedom from denominational viewpoints.

Evidence in support of the application suggested that about 40 percent of the listeners were not regular churchgoers but it is unlikely that many would be people without any Christian commitment.

We have commented before on the attractiveness of the music to a small audience.

Evidence of supporters indicated a belief that the programme would make a considerable difference to the life of the community. There was no evidence from Christchurch or Wellington to bear this out and we consider expectations of many of the supporters quite out of touch with the reality of the limited influence of radio on social and personal conduct.

There is undoubtedly a desire to present a Christian message which was made clear in comments such as Mr Brewster's references to use of FM: "High quality stereo ... would add very little, if anything, to the message."

Despite the existence of a wide range of support there was undoubtedly truth in the view which was best expressed by the Rev Michael W. Greer, Executive Officer of the Media and Communications Committee of the Methodist Church of New Zealand, when he said in a letter.

"Since its inception *Radio Rhema* has actively campaigned for the full support of the mainstream Christian churches in New Zealand. *Radio Rhema's* "Statement of Faith", presented to us when making their first approach some years ago, was not one which either then or now the Methodist Church in New Zealand would choose to be formally identified with—it represents a conservative theological viewpoint, and a somewhat narrow evangelical emphasis. In response, *Radio Rhema* adopted the statement of faith "The Faith we Affirm Together" being that approved by each of the negotiating churches as a description of the faith held in common. However, *Radio Rhema* chose to hold the Statement of Faith in tandem with the earlier statement—needless to say we felt there was some ambiguity in their action."

The extension of broadcasting by this network approach to the bulk of the audience in New Zealand would put *Radio Rhema* in a unique position, comparable more to that of the Broadcasting Corporation which is a publicly owned and appointed body, than to any other private station.