- Although only two warrants were involved the station would, because of synchronous use of frequencies, broadcast to Auckland, Wellington, Christchurch, Hamilton (the four largest cities in New Zealand) and to Nelson, Tauranga and Whangarei. We have to acknowledge that this would be the grant of a nearnational network to one group. It may pre-empt the possibility of diversity of programming by preventing any other group from establishing a service for the same audience in the most populous regions in New Zealand.
- Evidence was given that people expressing adherence to Anglican, Catholic, Presbyterian and Methodist Churches are some 61 percent of the population. Among Radio Rhema's membership they constitute only about 24 percent. A great majority of membership comes from denominations which do not individually have strong numerical support within the New Zealand population. This bears out the allegations that it reflects a conservative and evangelical viewpoint.
- This was reinforced by evidence of published remarks in a newsletter which referred to a spiritual war and.
 - "This is God's work and we are right in the centre of His will as we move, forward to push back the gates of hell and push the devil off his predominant perch that he occupies over the airwaves of Auckland."
- Radio Rhema's counsel suggested, in relation to mainstream church membership, that the difference in proportions arises because of the difference between adherents and committed churchgoers. Radio Rhema promotes in the churches and it is generally committed churchgoers who become members. In other words, the mainstream churches do not have among their adherents a high proportion of churchgoers. Nevertheless the fact remains that its emphasis comes from those associated with a particular view of Christian belief.
- Mr Anastasiou's response to the reference to the newsletter was that some of its contents amounted to Christian jargon which would be well understood by the readers.
- We believe that this might be so in respect of those members of certain churches referred to with a high membership proportion, but we do not believe that those remarks are typical of material which would be found in church newsletters of the mainstream churches.
- Also in the newsletter was this statement:
 - "We have been told that groups calling themselves "Satanists" have been formed over the last few years in Auckland, Tauranga, Nelson, Wellington and Christchurch. These groups have been praying and fasting every Wednesday to satan requesting him to break up the family units in New Zealand and to destroy Radio Rhema!... This news just makes us more aware of how great an impact Radio Rhema is already making. No wonder we are experiencing difficulties in our attempts to get the gospel into the northern region."
- As Mr Thomson, for the Corporation, has pointed out, Mr Berry could not substantiate this claim which cast some doubts on the methods used to recruit support for the station.
- Counselling—A considerable amount of time—in fact too much time— was spent on traversing the counselling proposal.
- A proposal to associate counselling with a radio station is peripheral to the desirability of the broadcast service since any radio station can, if it wishes, promote counselling services run by any other agencies or by its own organisation.

The proposition that we should permit a radio station because it would run its own Christian counselling service, we would not in any event have regarded as lending a great deal to the application. However, it took on a different aspect when attention was fastened on to the nature of the counselling itself. There was considerable debate as to the extent to which the Jay E. Adams tapes were to be use. A copy of Mr Adam's book was produced and referred to. We were not at all satisfied as to exactly the basis of these tapes in relation to training counsellors after hearing Mr Pinkham's evidence.

We were told by Mr William Cole, a trained psychologist, called by Radio Pacific, that—.

- "The overall tenor of the techniques advised were of judgmental exhortations of a type likely to increase anxiety and guilt in people presenting with problems. In many cases this would be unhelpful. In some cases such methods could be downright dangerous, precipitating total mental collapse in already highly-stressed individuals."
- Mr Ewing Stevens from Radio Pacific, a Presbyterian minister,
 - "... feared that the approach to theology was so narrow and elitist that it must not only offend those of non-religious philosophies of life and those that follow religions other than the Christian religion, but also the large majority of believing Christian people."

He saw the counselling service, if it were based on the book, to be "an undisguised attempt at proselytising human beings in their moments of extremity into a very narrow and limited approach to the Christian faith."

We were, however, impressed with Mrs Foged who was called by *Radio Rhema* to give evidence of the training of counsellors. She did, nevertheless, concede that her aim in the counselling service was evangelism and to convert, both elements of which she saw as an essential part of the Christian role.

If only because of the matters raised at the hearing, we think it likely that the counselling service would now be more carefully based. What does become clear is that the prime purpose is an evangelistic one rather than of a client centred referral service. This bears, in our opinion, on only two aspects—.

1. The limited benefit of, or positive disadvantage of, permitting what is in effect a "marketing" arm of the station concerned with recruiting Christians through a counselling service.

It may be argued that this is not a positively harmful feature since those who did respond through contact with the station would be aware that it was a Christian oriented service and not one which necessarily totally respected the beliefs, or non-belief, of the individual concerned. However, it does not simply ask people who want to talk about Christian belief to contact the service. It offers counselling—helping—but is using the needs of the caller to bring about an introduction and an opportunity thereafter to influence them towards acceptance of the Christian faith.

After hearing the evidence we can say this: If we were to grant the application we could not control the counselling but we would want to lay down conditions as to the way ir which the "counselling service" would be promoted and referred to.

- The indication it gives of the purpose of the station which goes beyond the objectives of the Broadcasting Act, namely to proselytise.
- (b) The economic effect which the establishment of the station to which the application relates is likely to have in respect to broadcasting stations already in operation
 - It is clear the station will only have a small amount of support. In Wellington its reach was given to us as 10,000 compared with 2ZB's 142,000 and in Christchurch a reach of 22,000 compared with 3ZB's119,000.
 - The station has a comparative strength in the 7 p.m. to midnight period.
 - There was considerable discussion of the effect of a new operator in taking existing audience and thus increasing the cost per thousand rate for advertisers. We are satisfied that the audience will not be substantially drawn from non-listeners. Some audience will be drawn from non-commercial listeners in Auckland, although it is to be noted that they form a lower proportion of the audience in Auckland than in the southern centres.
 - The stations which appeal to an older audience, namely IZB, Radio I and Radio Pacific, would be affected but it would not be damaging to those stations. While it would affect the rate per thousand and while the overall performance of the station does affect advertisers' purchases, it has to be remembered that both Rado Pacific and Radio I substantially draw on local advertising which is not so sensitive to the cost per thousand. We are satisfied that that factor is significant in advertising agency buying but is not necessarily a dominating consideration.
 - We do not consider that the economic effect on the other stations would be sufficient to outweigh the advantages of a worthwhile non-commercial service being introduced which appealed to say a 3 percent audience share in Auckland.
- (c) The affect which the establishment of the station to which the application relates may have on broadcasting services provided by the Corporation in the public interest
 - We have substantially dealt with this aspect in the previous reference as to the economic effect. The loss of revenue to the Corporation would not be such as to affect services. The establishment of the station may however affect the way in which services are delivered by the Corporation and it is convenient under this heading to consider the effect on future potential services.
 - Evidence was given by Miss B. A. Wakem for Radio New Zealand of plans to develop 603 kHz as a Polynesian/access station. On the evidence we have at present and the changing pattern of radio development, we do not think it is possible to make a definitive judgment on the effect on future services of the Corporation in general.