Australian Government
Department of Infrastructure, Transport,
Regional Development, Communications, Sport and the Arts

Radio prominence framework for smart speakers

Impact analysis

Augus 2026

Table of Contents

List of Figures and Tables

Summary

Access to radio services is a key component of the Government's media reform agenda given the importance of these services to all Australians, particularly those living in remote and regional Australia. In many areas, broadcasting operators also provide their content and services via the internet. The online distribution of content tends to be more complex than broadcasting, with greater choice of content for consumers and additional technological challenges for those users seeking to navigate the environment.

In 2022 and 2023, the Government undertook extensive consultation to inform the development of a legislated prominence framework for free-to-air television services. This culminated in the design and introduction of the television prominence framework in Part 9E of the *Broadcasting Services Act 1992,* as amended by the *Communications Legislation Amendment (Prominence and Anti-siphoning) Act 2024*.

Engagement through this process revealed that radio broadcasters face similar challenges to free-to-air television broadcasters in reaching and maintaining their audiences' attention in an internet-enabled world.

Introduction

The ability of Australian listeners to easily access the online content of Australia's broadcasting services is vital to the achievement of important media policy objectives, including: an informed citizenry; a strong and vibrant democracy; and engaged and cohesive local communities. The transition of traditional media to the online ecosystem presents additional challenges for user access. This is particularly the case for internet enabled devices that offer access to online versions of traditional media, but which have changed the way in which users must navigate to these services.

Why radio prominence is a problem

The integration of radio services with voice assistant software is vital to audiences finding stations on smart speaker devices, as there is limited or no capacity for users to browse for media services and content visually. Listeners are wholly reliant on voice assistants to accurately interpret and surface their voice commands to listen to any audio content, whether that be a local radio station or another audio offering.

Similarly, a radio service carried on a smart speaker relies heavily on the hosting platform to reach their audience (to a greater degree than with a traditional radio device, or even a website stream or an app). To date, this relationship has generally been mutually beneficial:

- radio stations protect and gain incremental listening on smart speakers, which enables commercial entities to earn incremental revenues and national broadcasters to expand their reach; and
- smart speaker providers gain from being able to surface radio services, along with other audio content, through incremental product sales, the familiarisation of users with voice commands and apps that support the interface, and using collected data.[1]

This dynamic is forecast to change over the coming years. A key factor in the design of the United Kingdom's (UK) radio prominence framework has been the shifting bargaining power dynamic between voice assistant

---

[1] UK Department of Digital, Culture, Media & Sport (DCMS) (2023), Impact Assessment - Regulation of radio services across voice assistant platforms [PDF 1,627KB] (assets.publishing.service.gov.uk), UK DCMS, p 7-8.

platforms operating on smart speakers and radio stations. Smart speakers are expected to become less reliant on radio services; while radio broadcasters are becoming more dependent on voice assistant platforms for exposure to potential audiences.

A key concern for users and for the radio industry is the inaccurate surfacing of radio stations in response to user requests. This was an issue identified in consumer research commissioned by the Office of Communications (Ofcom) in the UK. It was also found to be a problem in 2018 through a Voice Request Audit undertaken by Commercial Radio & Audio (CRA).[2]

- According to this Audit, only 43% of requests for 370 station call IDs by the Google Assistant on a Google Home device returned accurate results.
- This accuracy reportedly improved substantially as a result of subsequent commercial arrangements struck between radio broadcasters and the major voice assistant platforms. However, there is no guarantee that this outcome will be maintained if those arrangements expire.

There is a case for the development of a regulatory framework to support access to Australian radio services on smart speakers. Radio services currently provide vital local content, news and emergency information to Australian audiences via voice-assisted smart speakers. However, platforms are becoming 'gatekeepers' to this growing means of radio distribution. Without intervention, the asymmetric relationship between platforms and radio broadcasters may intensify, and the achievement key public policy goals may be put at risk. This was the finding of the Senate Environment and Communications Legislation Committee, in its inquiry into the Communication Legislation Amendment (Prominence and Anti-siphoning) Bill 2023. The Committee recommended that the Government prioritise the implementation of radio prominence on smart speakers, forming the view that although swift action could be taken in relation to smart speakers, others—such as prominence in car audio systems—will take a longer timeframe.[3]

Public consultation

On 30 September 2024, the Department released a radio prominence proposals paper detailing eight elements for consideration when designing a radio prominence framework for smart speakers. Submissions to the consultation closed on 11 November 2024.[4] The development of the framework has taken into consideration the views of stakeholders provided during this phase, and has sought to balance the needs of each sector while supporting the achievement of established media policy objectives. It is expected that further consultation with stakeholders will take place as part of usual practices for legislative development.

Post-consultation analysis

The development of the recommended option has taken into consideration the views of stakeholders provided during the public consultation phase, as well as the views of the Senate Environment and Communications Legislation Committee through its inquiry into the Communications Legislation Amendment (Prominence and Anti-siphoning) Bill 2023.

Consideration has been given to how access to radio services can support the achievement of Australia's media policy objects, and how to balance the interests of each of the sectors that would be impacted by the radio prominence reforms. This led to the development of a model for a radio prominence framework that seeks to ensure that Australia listeners can easily access online radio services via voice request on a smart speaker in a way what minimises costs and disruption to broadcasters and the providers of voice assistants.

---

[2] Commercial Radio and Audio (CRA) (2018), Voice Request Audit. Unpublished.

[3] Parliament of the Commonwealth of Australia, Senate Standing Committee on Environment and Communications (2024) Communications Legislation Amendment (Prominence and Anti-siphoning) Bill 2023 [Provisions] – Report April 2024, Parliament of Australia (aph.gov.au). See Recommendation 2 and discussion at 2.145.

[4] Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) (2024), Have your say - Prominence Framework for Radio on Smart Speakers, DITRDCA.

Options considered

This Impact Analysis (IA) investigates three policy options:

1. The status quo, where the prominence of Australian radio services on smart speakers is left to the market;
2. The implementation of a radio prominence framework as either: a) a 'defined terms' model; or b) a 'negotiated terms' model; and
3. An industry-delivered public education campaign on the use of smart speakers to access radio content, coupled with a funding program for broadcasters.

The preferred option

The recommended option is to legislate a radio prominence framework following the model described in Option 2a. This IA finds the objective of Australian radio services being available when Australian audiences ask their smart speakers to access them will be best achieved under a legislative framework that has clear obligations for voice assistant platforms and balanced protections for Australian radio services.

Both models for legislative reform set out in Option 2 take into consideration the views of stakeholders on eight framework elements, gathered during a public consultation period. The preferred framework model (Option 2a) seeks to balance the requirements of consumers and industry through a public policy lens. The preferred model for a radio prominence framework shares a number of features with Australia's recently legislated television prominence framework such as the application of the framework to mainstream broadcasting services, and the 'no cost' and 'no alteration' elements.

The Impact Analysis process

This IA has been prepared in accordance with the Australian Government IA requirements. As part of this process, parties that may be impacted by Government intervention to address the issue of radio prominence have been identified, and the net benefits and compliance burden that may be imposed are discussed in Chapter 4.

In the subsequent chapters, the seven assessment questions set out in the Australian Government Impact Analysis Framework (2026) have been addressed:

1. What is the policy problem and what data are available?
2. What are the policy objectives, why is government intervention needed to achieve them, and how will success be measured?
3. What policy options are being considering?
4. What is the likely net benefit of the option?
5. What consultation was undertaken and how was feedback incorporated into the policy design?
6. What is the best policy option and how will it be implemented?
7. How will the policy be monitored and evaluated?

1. What is the policy problem and what data are available?

Radio services are, and will remain, important in achieving media policy objectives: an informed citizenry; a strong and vibrant democracy; and engaged and cohesive local communities.

However, the way that these services are accessed and consumed by Australian listeners is changing. A key feature of these changes has been the take-up of smart speakers: internet enabled devices comprising a speaker and microphone which can operate independently of other internet devices. These devices were found in 32% of Australian households in 2022.[5]

Historically, Australian radio services have received 'prominence' on dedicated radio devices. These devices either exclusively or primarily use radio frequency tuners to access radio broadcasts, with a physical interface allowing direct control by users. Smart speakers do not provide equivalent direct access to radio services. Instead, they are typically operated by voice assistants that respond to user commands: a consumer asks for a radio service, and the voice assistant prompts the device to play that service.

The accuracy with which voice assistant software actions these requests is therefore the key determinant of whether a user can access the service they are seeking on a smart speaker. Australian broadcasters report that there has been significant variation over time in the extent to which voice assistant software accurately plays their services in response to user requests on smart speakers.

If responses are not accurate, or if services are unavailable, Australian listeners will have more limited opportunities to access to local radio services that inform and entertain. These services provide access to weather forecasts, traffic reports and emergency updates, as well as local and national news. They are subject to regulation under the *Broadcasting Services Act 1992* in relation to a range of matters, including the planning of radio services to broadcast in certain areas (licence areas), and the provision of certain content (including local content). However, these frameworks do not cover the operation or technical specifications for smart speakers.

1.1 Definition of prominence

Broadly, radio prominence refers to the ability of users of internet enabled audio devices to access local radio services via voice commands. Specifically, it refers to the accuracy with which voice assistant software responds to these commands.

As noted above, Australian radio services have historically been afforded prominence for their AM and FM services through in-home and in-car radios. These devices required the user to 'tune-in' to locally specific radio frequencies and could be set to particular radio stations. In the pre-internet era, AM and FM radio services were the only live audio options available to consumers.

In this regard, radio was a 'passively mediated' means of accessing radio content, where the device is simply a conduit for access to a radio station. The device has little control over the form of access, and no control at all over the content (other than sound quality and volume).

This outcome was a product of market factors and not the result of the regulation of radio reception equipment. This was a mutually beneficial arrangement for radio broadcasters, consumers, and automotive and electronics manufacturers. In this environment, a listener 'tuning in' on a car stereo, at the office or in their home, can expect to receive a reliable and contemporaneous broadcast of Australian radio content of their choice.

---

[5] Telsyte Australian IoT@Home Market Study 2022, as referenced in Australian Competition & Consumer Commission (ACCC) (September 2023) 'Digital Platform Services Inquiry – September 2023 interim report', ACCC, p 73.

The increased use of internet-connected devices has changed the way Australian radio services are accessed and consumed. While traditional radio broadcasts are still available, listeners increasingly stream online simulcasts. Voice activation software is the key access mechanism for these devices, which was not a feature of traditional radios that operate using radiofrequency tuners. Internet-enabled audio devices are 'actively mediating' audio content (including radio content), with the capacity to facilitate (or alter, or not surface) the delivery of content from the provider to the listener. As a result, the prominence of online radio services is determined by the accuracy of the voice activation software responding to user requests.

1.2 Radio services remain central to Australia's media policy objectives

Australia's radio sector provides close to universal access to news and entertainment content through a combination of terrestrial broadcasting and services made available over the internet. Its ubiquity means that Australians still rely heavily on radio for news and information.

- In 2024, radio was the medium by which 43% of Australian adults accessed most of their news content and current affairs; behind domestic / Australian news websites or apps (48%), and social media (45%), and ahead of publicly owned free-to-air TV (34%).[6]
- The University of Canberra's *Digital News Report: Australia 2023* found that there is substantial difference across the generations for accessing news through radio, with older generations more inclined to listen to radio (77+ age group – 41%; baby boomers – 30%; Gen Z – 14%).[7]

The broader importance of radio is reflected in Australia's media policy objectives. These objectives reflect the role that radio broadcasting has in providing information and entertainment, as well as developing and reflecting a sense of national identity, character and cultural diversity. The objects of subsection 3(1) of the *Broadcasting Services Act 1992* (BSA) include (among others):

a) to promote the availability of a diverse range of radio and television services offering entertainment, education and information;

b) to provide a regulatory environment that will facilitate the development of a broadcasting industry in Australia that is efficient, competitive and responsive to audience needs;

e) to promote the role of broadcasting services in developing and reflecting a sense of Australian identity, character and cultural diversity;

ea) to promote the availability to audiences throughout Australia of television and radio programs about matters of local significance;

f) to promote the provision of high quality and innovative programming by providers of broadcasting services; and

g) to encourage providers of commercial and community broadcasting services to be responsive to the need for a fair and accurate coverage of matters of public interest and for an appropriate coverage of matters of local significance.

These objectives remain relevant in the contemporary media environment. Radio broadcasters continue to make valuable services available to the majority of Australians, while the radio industry increases its operating capacity and offerings in the online environment.

---

[6] Social Research Centre (2024), 'The Television & Media Survey 2024 – Summary Report', DITRDCSA, p 85.
[7] Park S, McGuinness K, Fisher C, Lee JY, McCallum K, Cai X, Chatskin M, Mardjianto FXLD, & Yao (Pinker) S (2023), 'Digital News Report: Australia 2023', News & Media Research Centre, University of Canberra, p 76.

1.3 Changes in technology and consumer behaviour

Australians are increasingly using smart speakers to access a wide range of audio content, including live radio. While dedicated radio devices are almost exclusively used for live radio listening, this type of device is becoming less and less common in Australian households, as smart speakers become more common.

- Ownership of traditional 'in-home' radio sets fell from 70% in 2017 to 44% in 2023.[8]
- Ownership of smart speakers is reported to have increased from 5% in 2018 to 26% in 2021 and has risen further in 2022 to 32% of Australian households, or 3.2 million households.[9]

Ownership of radio in cars has remained relatively stable between 2017 (90%) and 2023 (87%).[10] In 2024, 81% of Australian adults who listened to radio content reported using a car audio system for listening.[11]

- 29% of respondents who listened to radio via the internet or an app did so through a car audio system, which was the second most common way of listening to this type of content, behind a smartphone at 67%.
- 66% of respondents who listened to Digital Radio (DAB), did so through a car audio system, followed by a dedicated radio system (34%), and smartphone (19%).[12]

Technology changes will continue to drive changes in media markets and present challenges and opportunities for existing and new media businesses.

1.3.1 Voice assistant software

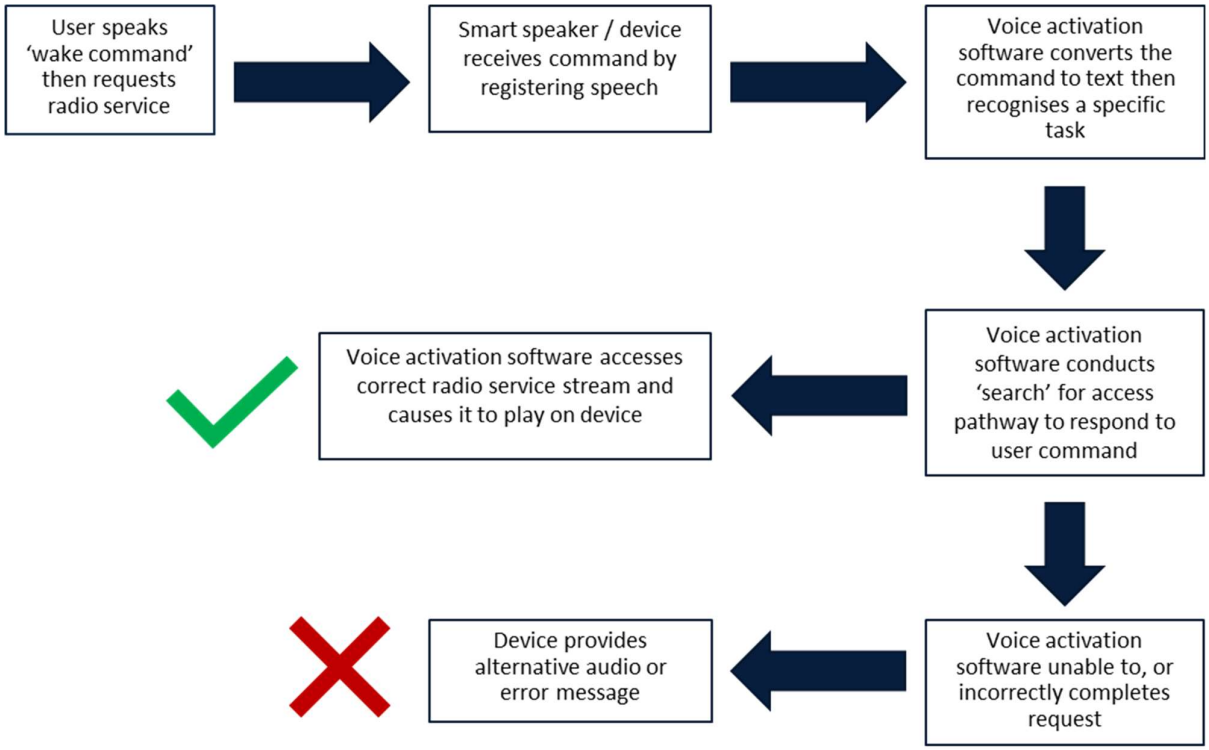
The technological shift toward smart speakers is part of a broader adoption and use of internet-connected devices by Australian households.[13] An important feature of modern mobile devices (such as smart phones and tablets), and home devices (such as smart speakers and certain smart TVs), is the integration of voice activation software, or 'voice assistants'. Many devices (including smart speakers) are almost exclusively controlled by voice assistants, with the three most popular in Australia being Google Assistant, Amazon's Alexa and Apple's Siri.[14]

The process that occurs when a user makes a request using a voice assistant is depicted in Figure 1.

---

[8] ACMA (2023), 'Communications and media in Australia: How we watch and listen to content November 2023', ACMA, Chapter 8.
[9] CRA (2021), 'The Smart Audio Report Australia 2021', Commercial Radio & Audio, p 4, accessed 11 November 2024; Telsyte Australian IoT@Home Market Study 2022, as referenced in ACCC (September 2023) 'Digital Platform Services Inquiry - September 2023 interim report', ACCC, p 73.
[10] ACMA (2023), 'Communications and media in Australia: How we watch and listen to content November 2023', ACMA, Chapter 8.
[11] Social Research Centre (2024), 'The Television & Media Survey 2024 – Summary Report', DITRDCSA, p 81,. Note: NET of FM Radio, AM Radio, Digital Radio (DAB), and Radio via the internet or an app excluding podcasts
[12] Social Research Centre (2024), 'The Television & Media Survey 2024 – Summary Report', DITRDCSA, p 81,. Note: NET of FM Radio, AM Radio, Digital Radio (DAB), and Radio via the internet or an app excluding podcasts
[13] Telsyte, as referenced by Statista Consumer Insights (2023), Industries & Markets: Consumer electronics in Australia, Statista, p 8.
[14] Telsyte Australian IoT@Home Market Study 2022, as referenced in ACCC (2023) 'Digital Platform Services Inquiry – September 2023 interim report', ACCC, p 74.

Figure 1: Accessing audio content via a voice assistant



Global data on the use of voice assistants indicates that convenience is the key factor in the take up of voice assistants, with 90% considering voice search to be easier and faster than a standard typed search.[15]

- Australian consumers have a clear preference to use smart speakers to control other smart home devices, with speed of use and increased convenience cited as key reasons for doing so.[16]
- It is also an accepted and desired feature of consumer electronics, with 36% of Australians surveyed in 2023 responding in the affirmative to the statement 'I would love to control my home via smartphone or voice.'[17]

With respect to smart speakers, Google, Amazon and Apple are the only providers of voice assistants at any scale in Australia, integrating this software into their own devices or into third-party devices. Other popular voice assistants are tied to particular brands of devices but not deployed on all products, such as Samsung's Bixby.

With ownership of dedicated radio devices in decline, smart speakers are likely to be the main choice for home listening in the future, based on the current usage patterns and take-up rates. However, smart phones are also important for the provision of internet connectivity to audio devices on the move.

1.3.2 Listening to radio and radio-like services

The choices for listening to radio and radio-like content have proliferated. A diverse range of Australian and international entities are vying for Australian listeners across all forms of radio services and online audio content streaming services at the listener's discretion. As outlined in Table 1:

- Radio broadcasts (FM and AM) were most commonly consumed in cars in 2024 (84% and 73% of Australians, respectively, who listened to that kind of audio content in the past 7 days), followed by digital

---

[15] Laborde S, (2023) Key Voice Search Statistics [2023 Updated Data] , Techreport.
[16] Telsyte Australian IoT@Home Market Study 2022, as referenced in ACCC (September 2023) 'Digital Platform Services Inquiry – September 2023 interim report ', ACCC, p 75.
[17] Statista Consumer Insights (2023), Industries & Markets: Consumer electronics in Australia, Statista, p 34.

radio (DAB) which is available only in limited regions (62% of Australians who listened to DAB in the past 7 days).

- Podcasts and online music streaming services were most commonly accessed via smartphones in 2024 (86% and 83% of Australians, respectively, who listened to that kind of audio content in the past 7 days).
- Radio listening via the internet was the most common use of smart speakers in 2024 (24% of Australians listened to that kind of audio in the past 7 days), followed by DAB (14%), AM radio (9%) and FM (7%).[18]

Table 1: Devices used to listen to audio content (past 7 days)

	Car audio system	Dedicated radio	Smartphone	Computer / Tablet / Laptop	Smart Speaker	Other
FM radio	84	26	10	4	7	1
AM radio	73	41	17	10	9	1
Digital radio (DAB)	62	37	15	8	14	1
Radio via the internet or an app (excluding podcasts)	31	11	56	37	26	3
Online music streaming service	30	2	83	31	24	3
Podcasts	19	2	86	20	7	1

Source: *Television & Media Survey 2024*, Q: "In general, what do you use to listen to…". Percentage of listening by device. Note: the survey results reflect consumer understanding of audio technology and should be treated with care; eg. smart speakers are unlikely to have a radio frequency tuner and are connected to the internet.

Research commissioned by CRA in 2022 highlights the importance of listening to radio in the home environment.[19]

- At home listening constituted more than 53% of metropolitan listeners average daily listening time, with 70% of that time spent listening to commercial radio.[20]
- Metropolitan listeners only spent 28% of their average daily listening time in the car, although 87% of that was spent listening to commercial radio.[21]

1.4 Radio services face prominence challenges

Developments in technology have fundamentally altered the ways in which audio content is distributed and consumed. Although media markets are growing, radio services are facing three key prominence challenges in deliver their content to Australian listeners. This has significant repercussions for the listeners that rely on radio services, and the ability of the sector to delivery on the public policy objectives outlined in section 1.2.

1.4.1 Challenge 1 – 'inaccurate surfacing'

Access to connected devices is increasingly being monetised, with content services having to pay to enable their audience and device users to be able to receive a basic level of accurate discoverability of the radio service. It is not realistic for Australian radio broadcasters to 'walk away' from negotiations with voice assistant platforms and the manufacturers of smart speakers (and pursue alternative means of reaching

---

[18] Social Research Centre (2024), 'The Television & Media Survey 2024 – Summary Report', DITRDCSA, p 81. The figure of 11% is a net from the use of smart speakers to listen to FM Radio, AM Radio, DAB, and Radio via the internet or an app.
[19] CRA (2022), 'GfK Australian Share of Audio 2022', CRA.
[20] CRA (2022), 'GfK Australian Share of Audio 2022', CRA, p 20.
[21] CRA (2022), 'GfK Australian Share of Audio 2022', CRA.

audiences), as these platforms are increasingly the key gateways for reaching audiences as traditional receiving equipment for terrestrial broadcasts declines in popularity.

RMIT University device testing

In response to the Department's proposals paper, researchers in the RMIT School of Media and Communication provided a submission containing original research about surfacing accuracy on smart speakers in Australia.[22]

The research assessed Google Assistant, Amazon Alexa and Apple Siri by issuing voice commands to first-party devices to test the accuracy of responses. The research tested response rates for 374 radio stations across the three platforms, and found that accuracy results varied significantly. Stations were accurately surfaced:

- 68% of the time by Google Assistant;
- 67% of the time by Alexa; and
- 41% of the time by Siri. [23]

This demonstrates that between 3 in 10 and 6 in 10 requests to play radio stations did not result in the device accurately playing the requested radio station.

Ofcom's *Smart speakers research with the public* report

Research commissioned by Ofcom in 2022 found that consumers were generally positive about voice activated smart speakers, citing convenience, integration and a wide range of functions as key benefits (among others).[24] However, the research identified several drawbacks or downsides to the technology. The two most commonly identified were:

- the speaker misunderstanding or not understanding the commands of the user; and
- the speaker playing inaccurate or wrong results in response to a request.[25]

Survey participants considered the issue of misunderstanding to be linked to a broad range of reasons, including accent, speech pattern, vocal pitch and volume of the user, with women and children having the most reported issues.[26] Inaccuracy of results were not generally considered linked to the issue of misunderstanding the user.

2018 Voice Request Audit

The Audit was conducted by CRA to determine if radio station call IDs would be recognised by the Google Assistant on Google Home and, if so, through which aggregator or nominated station app it would be played.

CRA requested a Google Home device to play some 370 Australian radio stations, either online streams of terrestrial radio services (such as 702 ABC Sydney or 2GB), or popular online- or digital-only services (such as SBS Chill or Coles Radio).

According to CRA, the Audit found that, overall, only 43% of requests resulted in the requested station being played (a failure rate of 57%, or 210 of the 370 stations). The Google Assistant reportedly responded to the call ID requests with responses such as: '[call ID] isn't available or can't be played right now'; 'Sorry, I don't know how to help with that'; or asked for further information such as which devices to use. In other cases, a playlist or song (often unrelated) was reported to have been played from YouTube or Google Music.

Subsequently, CRA entered into a commercial agreement with Google and a separate arrangement with Amazon to improve the identification of Australian radio stations. CRA has indicated that the request accuracy

---

[22] Lobato, R. and Arnot-Bradshaw, A. (2024), 'Smart speakers and radio distribution in Australia: A submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' *Radio Prominence on Smart Speakers* proposals paper', DITRDCSA.

[23] Lobato, R. and Arnot-Bradshaw, A. (2024), 'Smart speakers and radio distribution in Australia: A submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' *Radio Prominence on Smart Speakers* proposals paper', DITRDCSA, p.5.

[24] Ofcom (2022), 'Smart speakers research with the public' research report, Ofcom, p 21-25.

[25] Ofcom (2022), 'Smart speakers research with the public' research report, Ofcom, p 26-27.

[26] Ofcom (2022), 'Smart speakers research with the public' research report, Ofcom, p 26.

on Google and Amazon smart speakers improved substantially, but remains concerned that there is no guarantee that the large digital platforms will continue to provide access to Australian radio if and when those agreements expire. The 2024 RMIT research noted above indicates that failure rates remain relatively high.

1.4.2 Challenge 2 – 'gateway' devices

The Australian Competition and Consumer Commission (ACCC), in its Digital Platform Services Inquiry, found that smart speakers (along with other smart home-devices) are 'gateway devices': playing an important role in governing how consumers access content and services through the internet, and how consumers use other smart home-devices.[27]

- Radio stations need to pass through the smart speaker 'gateway' to reach their audiences. In this way, a radio service carried across a voice assistant interface is dependent on the platform – in contrast to the situation with a traditional radio device with a radiofrequency tuner, or even a website or an app.[28]
- This, in turn, requires some form of direct relationship between the radio station and the platform, or between the radio station and an aggregator, who then manages the relationship with the platform. By its nature, this is an asymmetric relationship.[29]

At noted in subsection 1.1.1, Google, Amazon and Apple are the leading providers of voice assistants in Australia and integrate these assistants into their own-brand smart speakers and also make them available for other device manufacturers. Google is the market leader in the smart speaker product category in Australia, with around 66% of Australian adults owning a Google device as at December 2024:

- 40% owned a Google Home device (Google's smart speaker offering until 2019); and
- 26% owned a Google Nest device (available from 2019).[30]

This was followed by households with an Amazon Echo smart speaker (31%) and an Apple HomePod smart speaker (18%), along with a 'tail' of manufacturers with a smaller market share: Bose; JBL; and Edifier, among others.[31]

Interconnected products, such as smart speakers that can connect to other products in a brand's range, can create a range of benefits for consumers, enabling a seamless experience across products and services and greater personalisation and tailoring of services. They can also provide media firms with additional avenues through access to broader audiences that may not be currently using a service or product.

- Radio stations can maintain and gain listeners, which enables them to earn incremental commercial revenues.
- Smart speaker providers can gain from having radio present on devices through incremental product sales, the familiarisation of users with voice commands and apps that support the interface, and through the use of data.[32]

However, the ACCC has identified competition issues that can arise where digital platform service providers that have a gatekeeper position may also have an increased ability and incentive to engage in 'steering' practices that direct a user's attention to services that generate higher profits for the platform.[33] Of particular relevance to this impact assessment are first-party audio services, including: Amazon Music and Audible; Apple Music and Apple Podcasts; and YouTube Music and Google Podcasts.

The ACCC also noted that voice assistants can provide a further opportunity for digital platforms to steer users in favour of first-party products and services.[34] Browsing products by voice also tends to provide consumers with fewer options and less information compared with websites, particularly when using smart speakers.[35]

---

[27] ACCC (September 2023), 'Digital platform services inquiry – September 2023 interim report' ACCC, p 70.
[28] UK DCMS (2023), Impact Assessment - Regulation of radio services across voice assistant platforms [PDF 1,627KB], UK DCMS, p 10.
[29] UK DCMS (2023), Impact Assessment - Regulation of radio services across voice assistant platforms [PDF 1,627KB], UK DCMS, p 11.
[30] Statista Consumer Insights (March 2026), Smart speaker ownership by brand in Australia as of December 2024, Statista.
[31] Statista Consumer Insights (March 2026), Smart speaker ownership by brand in Australia as of December 2024, Statista.
[32] UK DCMS (2023), Impact Assessment - Regulation of radio services across voice assistant platforms [PDF 1,627KB], UK DCMS, p 7-8.
[33] ACCC (September 2023), 'Digital platform services inquiry – September 2023 interim report', ACCC , p 130.
[34] ACCC (September 2023), 'Digital platform services inquiry – September 2023 interim report', ACCC , p 131.
[35] ACCC (September 2023), 'Digital platform services inquiry – September 2023 interim report', ACCC ,.

Similarly, a report from Frontier Economics, commissioned by Bauer Media in the context of the UK's Digital Radio and Audio Review, found that the value exchange between the two parties – which has tended to be mutually beneficial to date – is expected to shift in favour of the platforms over the coming years as the share of listening carried on these devices grows.[36] This is because:

- smart speakers will become less reliant on radio (due to the maturation of the smart speaker market and the development of alternative streaming services); while
- radio broadcasters will likely be more dependent on voice assistant platforms (due to a higher share of radio listening being via voice assisted software, and a decline in the number of households with traditional analogue or digital radio sets).[37]

The Impact Analysis undertaken by the Department of Culture, Media and Sport for the UK's radio prominence framework found that there is likely to be a 'tipping point' whereby radio will become dependent on the platforms for access to its listeners, which would provide the platforms with a clear economic incentive to seek to monetise the provision of radio services.[38]

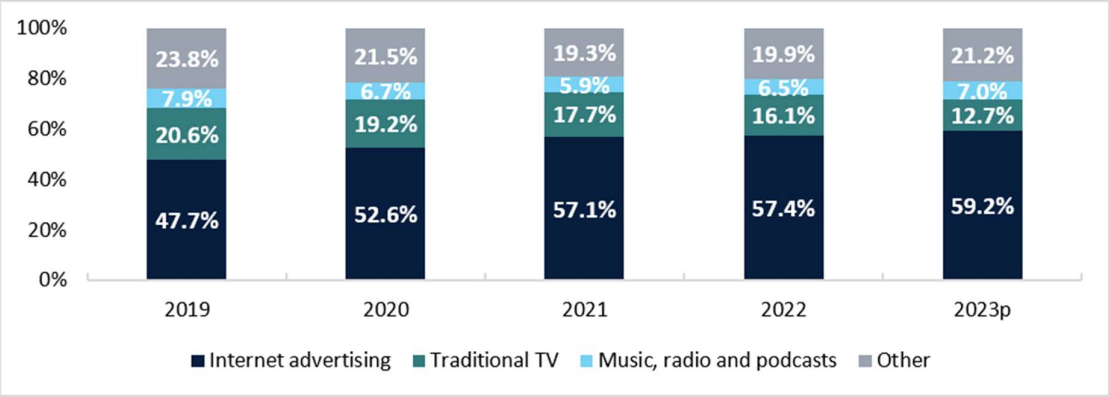
> *"Although relationships have been benign since the emergence of voice activated smart speaker devices in 2016, it is this risk - the risk that the public value inherent in continued access to live, licensed radio services will be intermediated and monetised by the platforms - that the new measures to regulate radio access across voice assistant interfaces in the draft Media Bill seek to address."* [39]

The Impact Analysis further noted that although the tipping point is unlikely to have been reached, other media sectors – such as news publishing – highlight how quickly and dramatically market changes can impact content providers' long-term sustainability.[40]

1.4.3 Challenge 3 – sustainability of radio services

As new technologies and consumer preferences have emerged, broadcasters have faced increasing financial challenges as advertising revenue has moved from 'traditional' media, such as TV and radio, to online platforms (see Figure 2).

Figure 2: Advertising in the entertainment and media industry (industry percentage share)



Source: Department analysis of PwC Global Entertainment & Media Outlook (GEMO) 2019-2028 data, using PwC's 'Advertising' cut of entertainment and media sector financials. GEMO's calendar year 2023 data is not yet final, indicated by '2023p'.[41]

---

[36] Frontier Economics (2021) Frontier Economics for Bauer Media Audio: The value exchange between voice assistant platforms and radio broadcasters August 2021 [PDF 333KB], Frontier Economics, p 5.
[37] Frontier Economics (2021) Frontier Economics for Bauer Media Audio: The value exchange between voice assistant platforms and radio broadcasters August 2021 [PDF 333KB], Frontier Economics, p.5.
[38] UK DCMS (2023), Impact Assessment - Regulation of radio services across voice assistant platforms [PDF 1,627KB], UK DCMS, p 12.
[39] UK DCMS (2023), Impact Assessment - Regulation of radio services across voice assistant platforms [PDF 1,627KB], UK DCMS, p 12.
[40] UK DCMS (2023), Impact Assessment - Regulation of radio services across voice assistant platforms [PDF 1,627KB], UK DCMS, p 12-13.
[41] Due to double counting that occurs between revenue segments and overall internet advertising, the department has adjusted down the internet advertising segment by the double counted amount. These occurs with segments like digital music streaming advertising, where revenue is accounted

As detailed in the UK's Media Bill Overarching Impact Assessment, the transfer of value from radio stations to voice assistant platforms as listening trends shift over the next decade is a potential risk.[42] Modelling by Frontier Economics from the impact assessment estimated that in 2022 8% of total radio value was attributable to voice assistants; by 2032 this figure is expected to rise to 22%. Conversely, total voice assistant value attributable to radio in 2022 was calculated at 37% or 43%; this is predicted to have dropped to 20% or 29% by 2032.[43]

The sustainability of the radio sector is important because, as identified in section 1.2, it remains central to the achievement of the government's broader policy objectives, including: an informed citizenry; a strong and vibrant democracy; and engaged and cohesive local communities.

1.5 International approach to resolving access issue for local radio stations

Regulation to support the prominence of broadcasting services is relatively novel, with most interventions focusing on content type rather than service type. While Australia has implemented a prominence framework for free-to-air television services on internet connected television devices, only the United Kingdom (UK) has legislated frameworks for both television and radio broadcasting services. While the UK experience is unlikely to be identical to Australia, it provides a useful case study for considering radio prominence options, as outlined in Box 1.

Box 1: the UK's radio prominence framework

The UK's Media Act 2024 (Media Act) [44] sought to protect the availability of UK radio stations on connected audio devices, such as smart speakers, and ensure that they are accessible in response to a user's voice request.[45] In effect, the Media Act regulates voice assistant technologies (referred to as 'designated radio selection services' or RSSs), and requires Ofcom to provide the Secretary of State with a report making recommendations about which radio selection services should be designated, and to then maintain and publish a list of designated RSS on the Ofcom website.[46]

The legislation defines an 'internet radio service' and sets out the regulatory framework for internet radio service providers, including penalties for non-compliance and the payment of an annual fee. The BBC, commercial and community radio services are in scope. An initial list of notified internet radio selection services are expected to be published by Ofcom in 2026, when the new codes come into force.[47]

The Media Act creates an obligation for RSSs, and their providers, to ensure that listeners are able to use a radio selection service to select and listen to relevant internet radio services, and if this fails, the service should take reasonable steps to comply with the request such as ask the listener to repeat or clarify the request. The legislation also prevents providers of designated radio selection services from charging UK radio stations for facilitating user access to radio stations live services on internet enabled audio devices, or from altering the content of the live service, such as overlaying advertisements.

The UK's regime also requires the RSS to use the preferred access method of the internet radio service, unless that would be unduly burdensome, or the listener has requested another method. A provider of a radio selection service is not required to provide access where the listener has failed to take relevant action, such as install a relevant skill or app.

---

to both 'Music, Radio and podcasts' and 'Internet advertising'. These differences total AUD 1.729 billion in 2019, AUD 2.127 billion in 2020, AUD 2.477 billion in 2021, AUD 2.781 billion in 2022, and AUD 3.009 billion in 2023, which the department has removed from internet advertising and left in their original segments. Some minor double counting may still remain. The 'Other' segment in the graph combines advertising revenue across all segments other than Internet advertising, Traditional TV, and Music, radio and podcasts (business-to-business; cinema; newspaper; consumer magazine and books; OTT video; out-of-home advertising; Traditional TV; Video games and esports).

[42] UK DCMS (2024), UK Media Bill Overarching Impact Analysis, UK Gov, p 34.

[43] Frontier Economics (2023), An Assessment of the Bargaining Relationship Between Radio and Voice Assistant Platforms in the Coming Decade: A Report for Radiocentre, March 2023, p 30, as sourced from Annex D: Research, UK Media Bill Overarching Impact Assessment.

[44] UK DCMS (2024) Media Act 2024, UK Parliament.

[45] UK DCMS (2024) Media Act 2024, UK Parliament.

[46] Ofcom (2025), 'Consultation: Designation of Radio Selection Services – principles and methods of Ofcom's recommendations', Ofcom.

[47] Ofcom (2024), 'Media Bill: Ofcom's roadmap to regulation', Ofcom, p.17.

The UK's approach to radio prominence regulation provides some important learnings for Australia, which have been taken into consideration in the development of the proposal for an Australian radio prominence framework.

Of note, the UK has not sought to regulate television and radio services under a single prominence framework, nor in the same way. The Media Act instead establishes separate frameworks for each sector, with a different regulatory model underlying each regime:

- The UK's television prominence framework is based on a 'fair bargaining' model. This requires Public Service Broadcasters to offer their on-demand services to designated TV Platforms (largely device manufacturers), which, in turn, must carry those services once the terms of carriage are agreed by both parties. This approach operates on the basis that Public Service Broadcasters and TV platforms should always seek to pursue mutually beneficial commercial arrangements in the first instance. Ofcom has oversight and administrative powers to resolve disputes and intervene to support effective negotiations based on statutory objectives.
- By contrast, the UK's radio prominence framework is based on a 'no cost' model, with obligations of the framework applying to voice assistant technologies being designated into the framework based on a signification level of use of the technology by listeners of online radio services. As outlined in Box 1, the Media Act requires the providers of voice assistant technologies to provide a user with access to a specified radio station via a defined pathway. It operates as a 'no cost' access framework and prohibits those providers from charging UK radio stations for facilitating user access to live radio stations, or from altering the content of the live service. The radio services must be designated by the Minister responsible. This designation process and the use of a defined pathway are not features of the preferred framework discussed in this IA.

In addition, the UK's radio prominence framework applies to smart speakers, and not in-car infotainment systems. While the UK Government has agreed to keep in-car infotainment systems under review, it is not currently the key focus for its radio prominence framework.[48]

However, there are significant differences between the UK and Australia. While Australia is home to a similar number of radio stations as the UK, Australia is a larger land mass with a much more dispersed population. This means that the provision of radio content in Australia is more reliant on a combination of older and newer technologies, with differences between metropolitan and rural regions.

---

[48] UK DCMS(2023), Draft Media Bill: Government Responses to the Committee's Twelfth and Thirteenth Reports of Session 2022–23, UK Government, p11.

2. What are the policy objectives, why is government intervention needed to achieve them, and how will success be measured?

The Government is committed to a program of work to modernise media laws and fulfil the legitimate expectations of consumers and industry for consistency, transparency and equity in our regulatory environment. Access to services of broadcasting organisations is a key component of this reform agenda, reflecting the importance of these services to all Australians, particularly those living in remote and regional Australia.

There are currently no legislative requirements on audio devices to carry Australian radio services. Traditionally, carriage has been assured by the presence of radiofrequency tuners in radio devices. However, as part of this IA, consideration has been given to whether a non-regulatory approach to online radio services will be adequate to ensure that the media policy objectives outlined at 1.2 are supported.

2.1 Why is Government intervention needed?

At present, the relationships between voice assistant platforms and Australian radio broadcasters are a product of market forces and technological change. In this regard, the availability and surfacing of radio content, as well as the use of third-party aggregators, is typically determined by a combination of:

- commercial agreements between voice assistant platforms and radio service providers;
- any commercial arrangements between voice assistant platforms and other audio content service providers, including 'own brand' services; and
- other mechanisms used to surface content on a smart speaker, such as algorithms that use user data to determine a play list.

In this environment, there are emerging risks that Australian radio services will not be easily available to Australian audiences, which in turn threatens the achievement of key media policy objectives. This dynamic was summarised in chapter 1 in terms of the prominence challenges.

Inaccurate surfacing –a key concern for listeners and for the radio industry is 'inaccurate surfacing'. Inaccurate surfacing is the inability of a device equipped with a voice assistant to play a particular radio station in response to a user's voice command. This issue has been identified in a number of fora, including Australian academic research conducted by RMIT, consumer research commissioned by the Office of Communications (Ofcom) in the UK, and a 2018 Voice Request Audit undertaken by the peak body for Australian commercial radio broadcasters, Commercial Radio & Audio (CRA).[49]

Gateway to an audience – consumers are often 'takers' of the default experience set by connected device manufacturers and are more likely to be influenced by recommendations of the voice assistant and search function if their original request is incorrectly answered. This is a recent development for radio audiences, who on a traditional radio device had full control of the device and actively choose a service to listen to.

Sustainability of radio services – although Australian radio stations and voice assistant platforms have entered into commercial arrangements in the past, this appears to be through necessity on the part of radio broadcasters. Commercial free-to-air broadcasting services rely on advertising revenue in order to bring their product (a radio station) to the market (the general public) at no cost, and this business model will become increasingly unviable if they are required to pay to be available on a given platform.

---

[49] Commercial Radio and Audio (CRA) (2018), Voice Request Audit. Unpublished.

Market outcomes alone are unlikely to result in Australian consumers being able to continue to easily and accurately access the services radio broadcasters. Government intervention is therefore warranted to support the objective of enabling Australians to easily and accurately access radio services on connected audio devices with minimal effort, input or technical skills on the part of the user.

2.1.1 Government's capacity to intervene

Two of the more commonly used mechanisms to address concerns regarding access to services and to improve consumer outcomes are legislation and industry incentives and support programs.

- With respect to the radio prominence issue, legislation could establish a radio prominence framework to directly address the challenges identified above and enable Australian audiences to access radio services on smart speakers accurately, with minimal effort on the part of the user.
- As an alternative, or in addition to legislation, financial incentives or supports could be provided to radio industry participants to enable them to negotiate with the providers of voice assistant software and enhance the accuracy of the surfacing of user requests for radio services.

2.2 Barriers and constraints to Government intervention

Any form of Government intervention – regulatory or financial – has the potential to impose costs on industry (which may ultimately be passed on to consumers) and to distort markets.

A regulatory framework for radio prominence, or the provision of financial supports to radio providers to secure better prominence outcomes, would be a novel intervention in the Australian audio market.

Legislation has the potential to impose costs on the parties that are required to alter their actions or behaviour, and these potential costs are assessed in further detail in this IA. In terms of a radio prominence framework, radio services and software providers may be required to dedicate resources to comply with requirements of the framework, including ensuring the compliance of services and products with obligations. These costs may be passed through to consumers in terms of higher retail prices for devices.

The imposition of regulatory obligations may also benefit those larger or incumbent industry participants, relative to potential new entrants, as they are better able to accommodate the additional costs.

2.3 Objectives of reform and how will success be measured?

The objective for the radio prominence proposal is to enable Australians to easily and accurately access radio services on connected audio devices with minimal effort, input or technical skills on the part of the user. This can be broken down to three limbs:

- Australian radio services are available to be accessed on smart speakers; and
- User requests for Australian radio services are accurately responded to by voice assistant software; and
- Australian radio services are able to compete effectively with other audio services available on smart speakers.

The three objectives and their corresponding potential measurement metrics are described below in Table 2.

Table 2: Evaluation metrics for reform objectives

Objective	Metrics for evaluation	Evaluation methodology
Australian radio services are available to be accessed on smart speakers	Australian radio services are available on all smart speakers in response to voice requests	• Commissioned research - audit of accurate surfacing results on smart speakers • ACMA data - compliance data from any reform resulting in a legislative

Objective	Metrics for evaluation	Evaluation methodology
		framework
User requests for Australian radio services are accurately responded to by voice assistant software	User requests for smart speakers to play Australian radio services produce an accurate response above a specified threshold	• Commissioned research - audit of accurate surfacing results on smart speakers • ACMA data - compliance data from any reform resulting in a legislative framework
Australian radio services are able to compete effectively with other audio services available on smart speakers	Radio broadcasters have a sustainable business model to provide their services on smart speakers	• Consultation with radio services stakeholders to understand changes in competition in market • Data gathering – analysis of market conditions, including competition factors such as new entrants to audio content services sector

3. What policy options are being considering?

This IA considers three options to address the objectives for reform set out in Chapter 2:

- Option 1: no intervention (status quo) – no change to current arrangements
- Option 2: a regulated prominence framework
- Option 3: industry incentives and consumer education.

3.1 Option 1: No intervention

This option represents the status quo: what is expected to occur if no Government action is taken.

Under this option, the relationship between voice assistant platforms and Australian radio services would continue to be determined by market forces, consumer preferences and technological change. In the foreseeable future, the accuracy of voice assistant responses to a user request to access a particular radio service would be determined by:

- any commercial arrangements between voice assistant platforms and radio service providers;
- any commercial arrangements between voice assistant platforms and other audio content service providers, including 'own brand' services; and
- other mechanisms used to surface content on a smart speaker, such as algorithms that use user data to determine a play list.

This would not be a static situation, and developments such as the uptake and use of artificial intelligence in audio production and distribution may change this dynamic. However, in terms of what is reasonable to forecast, the dynamic outlined above is the most likely situation for the near-to medium-term.

3.2 Option 2: Legislate a radio prominence framework

This option would implement a legislative framework in the BSA to require the providers of voice assistant software to ensure that when a user requests a local radio service to be played by voice command, that radio service is accurately identified and played on the regulated device. The elements of the option are summarized in Table 3, which sets out two models for a radio prominence framework: a 'defined terms' model; and a 'negotiated outcomes' model.

Table 3: Comparison of elements for different models of a radio prominence framework

Elements of framework	Option 2a – defined terms	Option 2b – negotiated terms
1. Level of prominence	Consistent and reliable access – a regulated access provider must respond to and play a specific regulated radio service when requested to do so **by the user of a smart speaker**, where this is reasonable in the circumstances.	As per option 2a.
2. Payment for prominence	No cost – a regulated access provider must provide the required level of prominence for a regulated radio service (as above) **without the imposition of a fee, charge or other form of consideration**.	Fair bargaining – a regulated access provider must provide the required level of prominence for a regulated radio service (as above) following agreement of terms of access. Requires the technical and commercial terms of **access to voice assistant platforms to be fair and reasonable**, and stipulate

Elements of framework	Option 2a – defined terms	Option 2b – negotiated terms
		that all regulated radio service providers and the parties responsible for voice assistant platforms to **engage in good faith negotiations**.
3. Service integrity	No alteration – a regulated access provider would be prohibited from altering the content (including advertising) of a regulated radio service when providing prominence for the service.	No alteration as default – a regulated access provider would be prohibited from altering the content (including advertising) of a regulated radio service, **unless alternative agreement was struck between the access provider and regulated radio service.**
4. Regulated entity – regulated radio service providers	Australian national, commercial and community broadcasters – the framework would provide prominence for 'mainstream' Australian radio broadcasters that maintain an online presence.	As per Option 2a.
5. Coverage – regulated radio services	Online simulcasts of radio broadcasting services – the framework would apply to the **online simulcasts of the broadcasting services** provided by mainstream Australian radio broadcasters.	As per Option 2a.
6. Regulated entity – regulated access providers	Voice assistant platforms – the prominence obligations would apply to the providers of voice activation software **used in smart speakers**.	As per Option 2a.
7. Access pathway	Open access pathway – a regulated access provider would be able to determine the source or pathway for users to access a regulated radio service, unless the user requests a particular source.	Defined access pathway – a regulated access provider would be required to use **the source or pathway nominated by the regulated radio service** to respond to the user request, unless the user requests a particular source, or there is no designated access pathway.
8. Minimum technical standards	Negotiated standards – the framework would enable the relevant parties to determine any technical standards for the integration of regulated radio services and voice assistant platforms, with the ACMA to have the capacity to determine 'offer' requirements, should this prove to be necessary.	As per Option 2a.

3.2.1 Option 2a: Defined terms model

This model – as described in Table 3, column 2 – is the same as that outlined in the *Radio prominence on smart speakers* proposals paper. It would establish an 'accurate surfacing' framework for Australia radio services on smart speakers, at no cost to a broadcaster and without the capacity to alter the content of a regulated radio service.

This model would place the obligation for compliance on 'regulated access providers' – the providers of the voice activation software through which a user's command is facilitated – rather than the manufacturers of smart speakers, noting that in some instances it will be the same entity. Regulated radio services would be the online simulcasts of radio broadcasting services, and the pathway that the regulated access provider uses to surface the requested radio station would be left to regulated access providers.

3.2.2 Option 2b: Negotiated terms model

This model – as described in Table 3, column 3 – shares some of the elements of the defined terms approach, but allows for certain aspects of the framework to be settled by negotiation: payment (allowing for relevant parties to negotiate any payment for the provision of prominence); and service integrity (allowing for the alteration of content and services if agreed between the parties). This model would also allow for regulated radio service providers to determine the access pathway by which user requests for radio services are surfaced. The other elements of the defined terms model would also form part of this model (in relation to the level of prominence, regulated entities and minimum technical standards).

3.3 Option 3: Industry incentives and consumer education

This option would take a non-regulatory approach to addressing the risk of inaccurate surfacing of Australian radio services on smart speakers. It would entail providing a subsidy to radio broadcasters to partially compensate for the cost of entering arrangements with voice assistant providers to ensure that radio services are surfaced in response to user requests, coupled with an education campaign for audiences on how to improve the set-up of their smart devices to access Australian radio stations.

The education campaign would take the form of a web resource, possibly hosted on the ACMA website, listing the suggested ways to ask for Australian radio stations by category and for each major platform, for example. Major retailers would be asked to display the website address or QR code on their smart speaker displays. In parallel, a radio campaign could be run in the lead-up and implementation period of the scheme so that listeners are aware of the framework for smart speakers and the website resource.

4. What is the likely net benefit of the option?

The options described in chapter 3 would have a range of impacts on industry, Government and consumers. These impacts are described in this chapter. However, a comprehensive, quantitative estimate of each option is not feasible due to a lack of detailed cost and revenue information from radio broadcasters and the three large voice assistant software providers operating in Australia. This type of information tends to be commercially sensitive, and relevant parties have been unable or unwilling to disclose such information to support the development of this IA. Only one voice assistant software company provided a submission to the radio prominence consultation. However, this did not include revenue or cost data.

As a result, the key elements of a full cost benefit analysis could not be undertaken, including financial impacts and discounting future costs and benefits to attain present values. Predicting the impacts over the life of the proposed regulation is also difficult due to the opaque financials of stakeholders and the rapid changes playing out in terms of audio technologies.

Instead, the analysis in this chapter takes the form of a semi-quantitative assessment, detailed at section 4.4. Estimates of industry costs (regulatory burden measure) are discussed further at section 4.3 and in Appendix A. The analysis relies on information provided by stakeholders in response to the radio prominence consultation process. The analysis also relies on assumptions to inform a semi-quantitative breakdown of the expected impacts of each option on stakeholders. Key assumptions include:

- Under Option 1 (status quo), listeners are expected to continue to have inconsistent and, in the longer term, reduced, access to Australian radio content on smart speakers, and radio broadcasters are likely to continue to enter into commercial arrangements with voice assistant software providers and other entities to disseminate their content.
- Under Option 2 (legislative interventions), voice activation software providers would comply with a radio prominence framework and consistently and reliably surface unaltered Australian radio content at either no cost to the radio broadcaster via an open access pathway (2a), or as a result of fair negotiations via a defined access pathway (2b).
- Under Option 3 (industry incentives), radio broadcasters are expected to continue to provide radio content to listeners on smart speakers, but are likely to continue to enter into asymmetric commercial relationships with voice activation software providers to support access.

The interaction of these assumptions and the impact of these options is discussed further below.

4.1 Stakeholders identified and considered in the analysis

The following stakeholder groups were identified as being potentially impacted by the reform options:

- Australian Government entities
- Consumers and community groups
- Manufacturers of smart speakers and other devices capable of playing audio content
- Radio broadcasters
- Providers of voice assistant software which facilitates the playing of audio content on smart speakers.

These stakeholder groups were considered when identifying the impacts and distributing costs and benefits of the reform options.

While the direct costs of implementing the reforms will fall predominantly to voice assistant software providers, representatives for the radio sector and the Commonwealth Government, the benefits will be distributed more broadly to consumers and the radio broadcasting sector.

4.2 Government costs estimation

The cost to government of the legislative reforms would be comparable to other schemes that the ACMA has oversight and enforcement responsibilities for, such as the television prominence framework. However, it is not possible to precisely estimate the cost for the ACMA to implement and regulate new requirements of the proposed legislative options. Instead, the general expected impacts on the ACMA (as the regulator for the framework) can be described as new and increased pressure on the regulator to undertake:

- consultative and administrative activities to provide guidance to affected industry stakeholders and consumers;
- monitoring and enforcement activities to ensure compliance with the requirements of the framework; and
- analysis and reporting activities to provide clear advice to the Minister and Government as required.

These impacts will be dependent on approaches to delegated powers.

4.3 Industry costs estimation (regulatory burden)

The industry costs are estimated for different segments of industry, identified in the stakeholder listing at 4.1, and form the basis for the Regulatory Burden Measure. While the providers of voice assistant software would be the regulated parties under any radio prominence framework being considered in this IA, it is anticipated that radio broadcasters would also face some costs associated with providing their services in the agreed manner.

Regulatory Burden Measurement was undertaken in line with the Australian Government guidance[50] and identifies the average annual change in regulatory costs against 'business as usual' costs. The framework includes consideration of administrative costs, substantive compliance costs, and delay costs. No delay costs were identified for any of the options put forward in this IA.

Each regulatory burden estimate is set out for each option below, with calculations in Appendix A.

4.4 Semi-quantitative breakdown of impacts on business and consumers

A semi-quantitative assessment has been undertaken to describe and evaluate the impacts of the options considered in this IA on businesses and consumers. Challenges in quantifying direct costs and benefits arise from the limited information about the cost of compliance currently available from the relevant sectors.

As stated above, sensitive commercial in confidence information from industry has not been available. As such, this analysis relies on assumptions in determining impacts for the options (no intervention, legislative intervention, and non-legislative intervention).

The following factors were considered in assessing the impact of each of the options:

- the potential for change in financial benefits for radio broadcasters and voice assistant platform providers;
- the likelihood and magnitude of changes required to voice assistant platform systems and services; and
- whether there are impacts that are likely to negatively affect consumers.

---

[50] Regulatory Burden Measurement Framework, Office of Impact Analysis, accessed 20 January 2026.

The impact scale selected for the assessment of overall impact on stakeholders is an adapted Likert ratings scale[51], similar to a 'multi-criteria analysis' (MCA), represented as:

High positive	Positive	Modest positive	Neutral	Modest negative	Negative	High negative
1	2	3	4	5	6	7

Each rating is equally weighted and assigned a numerical rating of 1 (High Positive) to 7 (High Negative). The impact on each affected stakeholder group under each option is individually rated, and the overall rating for that option is scored by taking the average of the individual ratings.

Options assessed using the MCA as 'Negative' or 'High Negative' are considered to have significant impacts that are overall less desirable for a policy outcome.

A summary analysis and detailed semi-quantitative assessments by stakeholder group are presented in this chapter.

4.5 Option 1: No intervention

4.5.1 Regulatory burden

Option 1 forms the base case for the analysis, and it does not introduce any new regulatory costs on consumers (individuals), community organisations (community radio broadcasters), or identified businesses (being Australian radio services, and providers of voice assistant software).

Table 4: Option 1 - average annual regulatory costs (from business as usual)

Change in costs	Business	Community organisations	Individuals	Total change in costs
Total ($millions)	$ 0.000	$ 0.000	$ 0.000	$ 0.000

4.5.2 Assessment of impacts

A failure to implement an enforceable radio prominence framework for smart speakers is expected, in the long term, to have a negative impact on Australian radio broadcasters and a modestly negative impact on the consumers who use and rely on those services.

Maintaining the status quo is expected to result in the continuation of:

- **need for commercial arrangements** between Australian radio broadcasters and voice assistant platforms to ensure Australian radio content is accurately surfaced when requested by users.
- **inequality in bargaining power,** with an increase over the coming years, between Australian radio broadcasters and the providers of voice assistant platforms, leading to the capacity to exert greater control over the terms of access to radio services.

---

[51] The Likert scale is commonly used as a psychometric tool in educational and social sciences research; in this IA the scale has been chosen to represent the wide range of stakeholder views in a clear and visually appealing way.

Table 5: Stakeholder impacts of Option 1

Stakeholder	Description of impact	Impact
Consumers	Reduced ability to find Australian radio stations on smart speakers, with variation between voice assistant platforms.	7
Australian radio broadcasters	Ongoing requirement to enter into financial arrangements to ensure access to radio services on smart speakers, or suffer audience declines.	7
Smart speaker manufacturers	No impact being the status quo.	4
Voice assistant platforms used on smart speakers	No impact being the status quo.	4
Overall		5.5

4.5.3 Overall assessment

Option 1 would make no changes to existing regulatory arrangements. Current market trends – as outlined in chapters 1 and 2 – would be expected to continue.

The biggest positive associated with Option 1 is the lack of regulatory burden. By maintaining the primacy of the market in determining the level of prominence for Australian radio services, Option 1 does not place any additional compliance burden on industry.

However, as identified in Table 5, the overall stakeholder impact of this option is estimated to be modestly negative. This is largely because the impacts on consumers and radio broadcasters are expected to be negative; the availability of radio broadcasting services on internet enabled devices is likely, over time, to be diminished, with detrimental impacts for radio broadcasters and Australian audiences which use these products.

Under the status quo, smart speaker users are likely to continue to encounter problems surfacing radio content. As outlined in 1.4.1, academic research has found that:[52]

- Current accuracy rates are inadequate, with Google Assistant, Amazon Alexa and Apple Siri surfacing the correct radio station in response to a request for a simplified radio station 68%, 67% and 41% of the time, respectively.
- The accuracy of surfacing varied considerably across the different categories of radio broadcasters: national; commercial; and community. ABC and SBS radio services were most likely to be accurately surfaced, followed by commercial and finally community services.
- Voice requests often needed to be repeated with an official station name or call sign.

It is also possible that surfacing accuracy will deteriorate further. In the UK, Ofcom research found that 58% of smart speaker users that use their device to listen to radio said that it had played the wrong thing in response to a request to play a radio station or program in 2025, an increase from 49% the previous year.[53] This suggests a continuing decline in consumer experiences during the implementation phases before the UK's equivalent to a radio prominence framework comes into effect. Given that the voice assistant platforms used on smart speakers are available globally, there is a risk that Australian smart speaker users will also experience a degradation in voice request accuracy under status quo conditions.

---

[52] Lobato, R. and Arnot-Bradshaw, A. (2024), 'Smart speakers and radio distribution in Australia: A submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' *Radio Prominence on Smart Speakers* proposals paper', DITRDCSA, p.5.

[53] Ofcom (2025) Audio Listening in the UK 2025, p.10

The continuation of poor voice request accuracy rates for Australian radio services – or their further deterioration – would diminish the availability of these services over time, with detrimental impacts for radio broadcasters and Australian audiences.

4.6 Option 2: Legislate a radio prominence framework

4.6.1 Regulatory burden

A legislated radio prominence framework would apply new obligations to providers of voice assistant software and empower the ACMA to administer and enforce the framework. This would modify and extend the remit of the ACMA under the BSA and the *Australian Communications and Media Authority Act 2005* (ACMA Act).

The establishment of the framework, and its oversight by the ACMA, would impose an annual compliance burden on some sectors of the media industry. Providing additional functions for the ACMA in relation to the radio prominence framework would also have resourcing implications for the regulator, as mentioned at 4.2 above.

The estimated costs for complying with the ongoing obligations and reporting requirements of a radio prominence framework are set out in Table 6 below, on a per annum basis.

In this analysis, non-profit community radio stations are classified as 'community organisations' for the purpose of calculating the Regulatory Burden Measure. While broadcasters would not be directly regulated, it is expected that they would incur some costs as a result of being required to offer their services in the agreed manner, whether that be on defined or negotiated terms. With approximately 450 community radio stations in Australia, this is the largest group of effected entities. However, these services are not expected to undertake regulatory activities themselves, rather compliance activities are anticipated to be undertaken by the sector's representative body and have been calculated as such.

Within the 'business' category are commercial radio networks, national broadcasters and voice assistant platforms. However, the estimated costs for voice assistant platforms assume that ongoing costs will be needed to undertake regulatory activities as any necessary initial compliance activities would produce longer-term efficiencies and reduce costs for these entities. For further detail, see Appendix A.

As detailed in Table 3, there are differences between three of the framework elements between options 2a) and 2b), and these may result in different compliance impacts for voice assistant platforms.

- The 'payment for prominence' element includes sub-options for 'no cost' (access without the imposition of a fee or charge), or 'fair bargaining' (access following agreement of fair and reasonable terms). The 'no cost' sub-options would likely have a greater negative compliance impact for voice assistant platforms, as they would not be able to achieve a partial or full cost recovery for access that could be achieved under a fair bargaining regime.
- The 'service integrity' element is split between 'no alteration', whereby an access provider would be prohibited from altering the content of a radio service, and 'no alteration as default', whereby an access provider would be prohibited from altering the content of a radio service unless an alternative agreement was struck between the parties. As above, the compliance impacts for the voice assistant platforms are likely to be preferrable under a regime that enables negotiation on the terms of an agreement.
- The third element, 'access pathway', would present a higher compliance impact for voice assistant platforms if a negotiation regime was implemented. Under a 'defined access pathway', voice assistant platforms would be required to set up specific mechanisms to ensure accurate surfacing by the aggregator or pathway as chosen by the radio broadcaster. In contrast, the 'open access pathway' would allow the voice assistant platform to continue to utilise their current mechanisms for surfacing radio stations, as the voice assistant platform could determine the source or pathway for a radio service.

Table 6: Option 2 - average annual regulatory costs (compared with business as usual)

Change in costs	Business	Community organisations	Individuals	Total change in costs
Total Option 2a ($millions)	$ 1.251	$ 0.062	$ 0.000	$ 1.313
Total Option 2b ($millions)	$ 2.033	$ 0.052	$ 0.000	$ 2.085

4.6.2 Assessment of impacts

A legislated radio prominence framework would have a positive impact on both consumers and Australian radio broadcasters. However, it would have a modest negative impact on the providers of voice assistant platforms as they would be obligated to comply with the radio prominence framework.

A legislated framework would guarantee that radio services are easily available and accessible on smart speakers. This is expected to reduce the expenditure required by radio broadcasters to secure access for their services on smart speakers (compared to what they would otherwise be expected to pay in terms of direct fees or charges, or advertising revenue or inventory share arrangements). This would, for commercial radio broadcasters, boost their overall profitability. It would also provide flow on benefits for consumers, who may otherwise see a reduction in accuracy rates if arrangements between radio broadcasters and voice assistant platforms were not renewed.

Table 7: Stakeholder impacts of legislating a radio prominence framework

Stakeholder	Description of impact	Impact
Consumers	Increased accuracy in surfacing of voice requests for radio stations.	2
Australian radio broadcasters	No cost for radio prominence on smart speakers. Radio broadcasting services will no longer need to enter commercial arrangements to have prominence.	1
Smart speaker manufacturers	Increased accuracy in surfacing voice requests on manufacturers' devices.	3
Voice assistant platforms used on smart speakers	Initial cost of ensuring Australian radio prominence in smart speaker software. Foregone revenue from prohibition on charging for prominence.	5
Overall		3

4.6.3 Overall assessment

The models discussed for a legislated framework would be viable and are targeted to achieve a specific result, with both models focusing on improving outcomes for Australian listeners using smart speakers.

Option 2 would impose a regulatory burden on regulated access providers (voice assistant platforms), and radio services, as described in Table 6. The greater burden would be placed on providers of voice assistant software (i.e. Google, Apple and Amazon), rather than the representative bodies on the commercial and community radio sectors. The total quantum of costs is expected to be modest, given the majority of the requisite changes could be implemented via software updates.

The stakeholder analysis at Table 7 demonstrates an overall modestly positive stakeholder impact for Option 2. This is largely because a legislated radio prominence framework would have large positive benefits for consumers and Australian radio broadcasters. As noted in section 1.4.1, independent research has found that

surfacing accuracy on smart speakers is currently highly variable.[54] Were a legislated prominence framework successful in improving accuracy, this would be beneficial to the consumers that rely on radio (including the 43% that get most of their news from radio)[55] and all licensed radio broadcasters in Australia.

However, there is likely to be a negative impact on the providers of voice assistant software. There are likely to be two types of negative impacts on these providers:

- The direct cost of upgrading voice assistant software to ensure compliance with a legislated framework. This would include the initial cost of writing, testing and deploying software. Based on evidence provided to the Senate Environment and Communications Legislation Committee's inquiry into the bill to legislate television prominence, it is expected that these costs will be material, but limited.[56]
- The indirect cost of forgone revenue as a result of either the prohibition on charging radio broadcasting services for access to smart speakers (option 2A), or the fair bargaining requirement (Option 2b). The prohibition on 'payment' would not be limited to monetary fees and would include any non-monetary charges such as a share of radio advertising revenue, while the fair bargaining requirement would be intended to substantially increase the negotiating power of broadcasters. In either case, these requirements are likely to reduce the amount of revenue, or other benefits, that voice assistant platforms can demand from broadcasters for accurate surfacing. It is not possible to quantify this opportunity cost.

While these negative impacts are not immaterial, they are likely to be smaller than the positive impacts experienced by consumers and broadcasters. On this basis, Option 2 is assessed as having a modestly positive impact despite its regulatory burden.

4.7 Option 3: Industry incentives and consumer education

4.7.1 Regulatory burden

Option 3 represents a non-regulatory solution to the policy issue. While there would be costs incurred by business and community organisations in implementing the solution, there would be no regulatory requirements for participation.

Table 8: Option 3 - average annual regulatory costs (from business as usual)

Change in costs	Business	Community organisations	Individuals	Total change in costs
Total ($millions)	$ 0.000	$ 0.000	$ 0.000	$ 0.000

4.7.2 Assessment of impacts

Industry incentives, coupled with an education campaign directed at the users of smart speakers, would provide a partial solution to the policy objective, as discussed at section 2.1.

As previously noted, there is generally no directory or consumer browsing option to enable radio stations to bypass the need to integrate radio services within the smart speaker platform. A consumer education campaign may increase the technological competence and agency of users, and therefore increase access to radio services.

The willingness of the Commonwealth to partially subsidise the costs of accessing voice activation platforms may incentivise the providers of these platforms to increase their charges or fees to radio broadcasters. Even

---

[54] Lobato, R. and Arnot-Bradshaw, A. (2024), 'Smart speakers and radio distribution in Australia: A submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' *Radio Prominence on Smart Speakers* proposals paper', DITRDCSA, p.5.

[55] Social Research Centre (2024), 'The Television & Media Survey 2024 – Summary Report', DITRDCSA, p 85.

[56] Communications Legislation Amendment (Prominence and Anti-siphoning) Bill 2023 [Provisions] – Parliament of Australia

with Commonwealth support, it is expected that there would still be a requirement for radio stations to pay some level of fees to ensure consumers are able to access their services.

Table 9: Stakeholder impacts on industry incentives to provide radio prominence

Stakeholder	Description of impact	Impact
Consumers	Users may benefit from the guidance and information provided through the education campaign to set up their smart speaker to have optimal surfacing of their preferred Australian radio stations.	5
Australian radio broadcasting services	The Commonwealth subsidy may partially offset the costs of access to voice assistant platforms. However, radio broadcasters would be expected to need to continue to have to make some level of payment to these entities. A Commonwealth subsidy may not address the bargaining power imbalance between broadcasters and providers of voice assistant software. The education campaign may boost awareness of Australian radio stations, providing some offset to these direct costs.	5
Smart speaker manufacturers	The education campaign may boost awareness of smart speakers and increase sales.	3
Voice assistant platforms used on smart speakers	A Commonwealth subsidy for access fees may enable the providers of voice activation software to increase their revenue if they were able to increase any access or integration fees. The education campaign may act to boost awareness of voice activation platforms and the smart speakers on which they operate, increasing usage and product sales.	3
Overall		4

4.7.3 Overall assessment

Option 3 is viable. However, there are risks and costs associated with a non-regulatory approach to radio prominence.

- Firstly, consumer education campaigns are typically more successful when there is a clear understanding of the 'knowledge' the consumer is lacking. In this case, an education campaign would be most successful if the presumption is that failure rates for voice commands are in large part attributable to user error, which can be solved by greater user understanding of the technology. To a certain extent, various technological and environmental factors are likely to have an impact on the success of voice activation requests, and some of these can be fixed by the user through 'troubleshooting'.[57] However, failure rates for voice commands are expected to be driven by factors that go beyond the control of the individual user or any errors on their part in requesting radio stations.
- Secondly, providing incentives or financial assistance to industry may exacerbate the asymmetric commercial arrangements between radio broadcasters and voice assistant platforms. As noted previously, this asymmetric relationship is expected to grow over time, and a Commonwealth subsidy may act to cement this relationship by providing a financial incentive and implied permission to voice assistant platforms to charge radio stations for access to the respective platforms.

---

[57] White, L. 'Why is my smart speaker not responding and how to troubleshoot voice commands', www.alibaba.com, 10 February 2026.

4.8 Comparison of key impacts on stakeholder groups

The estimated impacts of the reform options can also be assessed in a semi-quantitative manner as specific metrics for each stakeholder group. The following four tables use the same impact scale described at 4.4, measuring impact from high positive (dark green) through to high negative (red). As none of the impacts are given more weight compared to other impacts for a stakeholder group, it is then possible to determine an average rating for the impact of each option for the specific stakeholder group.

For consumers, expected impacts centre around usability of a device and whether a consumer has confidence in using the technology. As discussed in Table 10, user confidence in accessing radio services on smart speakers, and user access to three different types of radio content, are expected to be the leading factors in determining a preferrable option. This method of assessment places Option 2, a legislative framework, as preferable due to a greater positive impact on consumers compared with the other non-regulatory options.

Table 10: Key impacts on consumers

	Reform Option				
Impact	**1**	**2a**	**2b**	**3**	**Explanation**
User confidence in accessing radio services on smart speakers	6	2	2	2	Option 1 would maintain the status quo in terms of access to radio services, which has seen inconsistency and inaccuracy in the surfacing of stations (with notable variation between voice assistant platforms). User confidence is expected to be negatively impacted in this situation. Options 2a and 2b would be expected to result in an increase in user confidence in surfacing results as a product of the introduction of a framework. Option 3 may improve user confidence if they benefit from the education campaign and are able to engage more confidently with their devices. Industry incentives may also improve confidence if they resulted in more accurate surfacing of stations over time.
User access to radio services' news and entertainment programs	6	2	2	4	Option 1 is expected to result in little change to the level of user access to radio services on smart speakers, which has seen inconsistency and inaccuracy in the surfacing of radio stations. This is expected to have a material, negative impact on consumers. Options 2a and 2b are expected to improve access to news and entertainment programs provided via radio services. Option 3 is expected to have a neutral effect as local radio services would need to implement bespoke strategies to maintain audiences.
User access to radio services' emergency information	7	2	2	4	Option 1 is expected to result in little change to the level of access to emergency information, which in turn would be impacted by inconsistent and unequal response rates to voice requests. Option 2a and 2b would address these concerns and are likely to result in an improvement in access to emergency information. Option 3 is expected to have a neutral effect as local radio services would need to implement bespoke strategies to maintain audiences.
User access to radio services' local news and community information	7	2	2	4	The status quo option (option 1) would do little to address inconsistent and unequal response rates, especially for smaller or CALD communities, resulting in suboptimal access to local information.

	Reform Option				
					Options 2a and 2b would be expected to result in an increase in consumer access as surfacing accuracy rates improve with the introduction of a framework. Option 3 is expected to have little material impact either way on access to local news and information.
Average	**6.5**	**2**	**2**	**4**	

For Australian radio services, key impacts centre around attracting and maintaining audiences on smart speakers. As discussed in Table 11, successful surfacing of radio content, financial arrangements with providers of voice assistant software, and reaching online audiences, are leading factors in determining a preferrable option. This method of assessment places Option 2, a legislative framework, as preferable due to a highly positive impact on radio services than the other non-regulatory options.

Table 11: Key impacts on Australian radio services

	Reform Option				
Impact	**1**	**2a**	**2b**	**3**	**Explanation**
Successful surfacing of Australian radio services on smart speakers	7	1	1	4	Option 1 would maintain the inconsistent levels of surfacing for Australian radio stations on devices. Implementation of a framework (2a or 2b) would be expected to ensure that Australian radio stations are successfully surfaced on smart speakers in most instances. Community education campaigns (option 3) will require additional resourcing, in part financed by Government, and may have only modest impacts on surfacing accuracy rates.
Financial arrangements to facilitate access to radio services on smart speakers	7	1	1	2	Without intervention (option 1) Australian radio service providers would still be required to enter into financial arrangements to ensure prominence for access to devices and audiences. Legislating a prominence framework, option 2, is expected to have a positive impact on radio services because commercial arrangements for access to devices will no longer be necessary. Option 3, although subsidising the possible costs of access, is not expected to completely remove the incurrence of such costs.
Opportunity to reach audiences through online offerings for radio services	6	2	1	3	Maintaining the status quo is expected to crimp the opportunity for radio services to reach online audiences. Option 2 is expected have a positive impact on the sector – radio services will be able to provide important information (as outlined in Table 13) to wider audiences in online formats and keep pace of technological changes. Option 3 is expected to have a moderately positive impact on reaching audiences online if it is able to improve consumer understanding of smart speaker technologies and accuracy rates from voice activation requests.
Average	**7**	**1**	**1**	**3**	

For manufacturers of smart speakers, key impacts are tied to maintaining market share of smart speaker sales. As discussed in Table 12, successful surfacing of radio content, and financial arrangements between the providers of voice assistant software and radio services, are key factors in determining a preferrable option for smart speaker manufacturers. This method of assessment places Option 3, a non-legislative intervention, as the preferable option due to the modestly positive impacts on manufacturers.

Table 12: Key impacts on smart speaker manufacturers

Impact	Reform Option 1	2a	2b	3	Explanation
Successful surfacing of Australian radio services on smart speakers	4	4	4	2	Retaining the status quo is expected to have a neutral impact on manufacturers, as the accuracy or inaccuracy of responses to requests for radio stations is not expected to materially change under this approach. Improved surfacing rates resulting from a prominence framework (option 2) may have a modestly positive impact on the sales of smart speakers as 'functionality' is important for consumer decisions on technology product purchases. However, this may be offset by negative industry perceptions of the framework in the implementation phase. The overall assessment of the impact of impact of the framework options on smart speaker manufacturers is expected to be neutral. An education campaign may result is greater consumer awareness of this device category and therefore improved sales. This is expected to be positive for manufacturers.
Financial arrangements to facilitate access to radio services on smart speakers	4	4	4	4	Financial arrangements to ensure that radio services' content is surfaced on smart speakers are generally made with the suppliers of voice activation software, rather than device manufacturers. As such, the impact on financial arrangements to facilitate access to radio services are expected to be neutral for all options.
Average	**4**	**4**	**4**	**3**	

For the providers of voice assistant software used on smart speakers, key impacts are tied to maintaining their market share of smart speaker sales. As discussed in Table 13, successful surfacing of radio content, and financial arrangements between the providers of voice assistant software and radio services, are likely to be the key factors in determining a preferrable option. This method of assessment places Option 3, a non-legislative intervention, as preferable to the other options due to the positive impact on the providers of voice assistant software.

Table 13: Key impacts on voice assistant platforms used on smart speakers

Impact	Reform Option 1	2a	2b	3	Explanation
Successful surfacing of Australian radio stations on smart speakers	4	4	5	4	Maintaining the status quo (option 1) would see voice assistant platforms maintain the existing service offering. This is expected to have a neutral impact on these providers. Both options for a radio prominence framework – 2a and 2b – are expected to have a generally neutral impact on the suppliers of voice activation software. However, option 2b is a 'must surface' obligation, under which the providers of voice activation software would need to negotiate with radio services on the access pathway. This may have a modestly negative impact on platforms if it were to result in the use of pathways that were suboptimal or not preferred by a given voice activation software provider. Option 3 is also expected to have a neutral impact on the suppliers of voice activation software as any enhancement in the accuracy of voice activation requests for radio

	Reform Option				
					stations is expected to have a minimal impact on these providers.
Financial arrangements to facilitate access to radio services on smart speakers	3	7	7	2	Option 1 is expected to have a modestly positive impact on the suppliers of voice assistance software as this would maintain existing commercial and technical arrangements. A legislated framework, in either form, would have a direct cost to voice assistant platforms to upgrade software to ensure compliance. Negative impacts could also arise from foregone revenue: the prohibition on charging radio broadcasting services monetary and non-monetary fees for access to smart speakers (option 2a), or the imposition of the fair bargaining requirement which is intended to substantially increase the negotiating power of broadcasters (option 2b). Option 3 is expected to be positive for the suppliers of voice assistant software as it would effectively provide a subsidy for access costs to radio broadcasters that could, indirectly, enable the providers of voice assistant software to maintain or increase their access fees.
Average	**3.5**	**5.5**	**6**	**3**	

5. What consultation was undertaken and how was feedback incorporated into the policy design?

The Government released the *Radio prominence on smart speakers proposals paper* for public consultation between 30 September and 11 November 2024.[58] The paper detailed eight key issues for consideration in designing a potential radio prominence framework for smart speakers, with multiple options for discussion for most of the key issues. A government preferred model for a radio prominence framework was also set out through a key issues discussion.[59]

Submissions were received from broadcasters, digital platforms and device manufacturers, and their representative bodies, as well as academics and the public. While geolocation of a device was not specifically considered in the proposals paper, this was an issue that was raised by various stakeholders during the consultation. A key stakeholder was also supportive of the inclusion of DAB+ stations as a regulated radio service provider. In response to the feedback, the proposed reforms have been adjusted to include geo-location and DAB+ stations. Stakeholder views are discussed in further detail at 5.1.

The design of legislation to implement the framework will take into consideration the views of stakeholders provided during this phase and will seek to balance the needs of each sector while supporting the achievement of established media policy objectives. Further consultation is also proposed in relation to the proposed legislation to enable all parties to provide comment on specific proposals.

5.1 Post-consultation analysis

The consultation provided insights into the relationships between voice assistant platforms and radio stations and the issues associated with users accessing radio stations accessing on smart speakers. These views and perspectives supported the consideration of options set out in the IA, noting the information limitations described in section 5.1.2.

5.1.1 What are the major stakeholder's views on the proposed radio prominence framework?

Radio broadcasters and aligned representative bodies

- Radio broadcasters were generally supportive of the proposed radio prominence framework, including the 'no cost' approach and the breadth of radio services under the scheme. However, they considered the framework should be extended to cover a wider range of devices; sought the inclusion of all their online content (including live simulcasts of broadcasts and on-demand content); and called for broadcasters to be able to 'nominate' the pathway by which radio services are surfaced on audio devices.
- The radio sector called for an implementation period for the framework of 6 to 12 months, and for the framework to apply to all devices capable of receiving software updates at the commencement of the framework. The radio sector also held differing views on the entities that should be required to comply with the prominence obligation; the level of prominence to be provided by 'regulated access providers'; and the approach to maintaining the integrity of the broadcast content as an online stream.

Voice activation software providers

- Amazon Australia was the only provider of a voice activation platform to make a submission in response to the proposals paper. Amazon argued that a radio prominence framework was unnecessary, but recognises and supports the policy objective of equitable access to the radio services in the digital age.

---

[58] Australian Government (2025), Have Your Say: Radio prominence on smart speakers proposals paper', DITRDCSA

[59] Australian Government (2025), 'Have Your Say: Radio prominence on smart speakers proposals paper', DITRDCSA, Table 1, p7-8.

- Amazon considered the scope of devices (smart speakers) to be too narrow and should be expanded to other more popular devices for audio listening, and that 'consistent and reliable' is a sufficient level of prominence. Amazon agreed that regulated radio services should be limited to online simulcasts, and to an open access pathway approach. However, they argued radio service providers must carry similar responsibilities to voice assistants.
- Amazon also observed that as voice assistants remain an emerging technology, it would be important to ensure that any new framework retains enough flexibility to enable experimentation and innovation on behalf of customers.

Device manufacturers and other content service providers

- Consumer Electronics Suppliers Association (CESA), representing device manufacturers, considered the definition for devices to be too broad; and noted that many elements would have business impacts that need a flexible approach.

5.1.2 Information limitations

Two of the three major voice assistant platforms – Apple and Google – did not participate in consultation. Without any formal input from these two platforms, the consultation could not reflect the full depth and breadth of stakeholder views. However, the input from Amazon is assumed to represent the sentiment of other voice assistant platforms – that is, no Government intervention is preferred, or if radio prominence is legislated, there should be an emphasis on flexibility and shared responsibility between sectors.

As discussed in Chapter 4, none of the submissions provided financial information, including detail of the commercial arrangements that have been entered in to by radio broadcasters, aggregators and voice assistant platforms. In lieu of detailed financial and technical information, this IA draws on desktop research and relevant, publicly available resources, data and analysis including: the development of the *UK Media Act 2024;* the ACCC's 'Digital Platforms Services Inquiry' (2023); the Senate Environment and Communications Legislation Committee's inquiry into the bill to legislate television prominence; and the OIA's Regulatory Burden Measurement Framework. Consideration has also been given to stakeholder views, particularly those drawn from the public consultation on a proposed radio prominence framework conducted in late 2024. Key data on smart speaker use has been sourced from external research.

6. What is the best policy option and how will it be implemented?

6.1 The preferred option

6.1.1 Option 1

Option 1 retains the status quo and would leave current market dynamics and relationships unaltered. A lack of intervention may lead to radio listeners experiencing a decline in the availability of local radio content on their smart speakers. Under this option, the stated objectives that Australian radio services are available on smart speakers, that users' requests are accurately surfaced on smart speakers, that listeners are supported in their choice of radio technology, and that Australian radio service providers remain competitive would not be supported or advanced by any particular intervention or action. The IA concludes that this option would have ongoing and overall negative impacts on listeners and radio broadcasters, and is not preferred.

6.1.2 Option 2

Option 2 provides a regulatory model for addressing prominence issues for radio services in smart speakers, with two sub options providing slightly different treatments for some elements.

- Sub-option 2a is a model with defined parameters and limited flexibility outside of the statutory provisions. However, it does not require providers of voice assistant software to follow surfacing pathways set by radio services.
- Sub-option 2b has many of the same defined parameters for the obligation placed on providers of voice assistant software, but introduces elements for negotiation under controlled settings and requires voice assistant software to surface radio services by the pathway set by any given radio service.

Option 2a and 2b would impose a regulatory burden and indirect costs on voice assistant platforms and the radio broadcasting sector. However, the IA identifies that it has net benefit overall, taking into account the stated objectives of this reform with regard to consumer access. Of the two sub-options, 2a has been found to support these objectives to the greater extent, and is **the preferred option**.

6.1.3 Option 3

Option 3 would provide the radio and retail sectors with opportunities to support consumers in making product choices and understanding and using smart speakers.

It would also offer some support for the radio sector in terms of the access costs associated with improving the accuracy of user responses to requests to surface radio stations. The ongoing benefits of this support are unclear, given the potential for the support to create an incentive for the providers of voice activation software to continue to seek access charges from radio broadcasters. While option 3 would support the objectives of this reform, this would be to a lesser extent that option 2. This option is not preferred.

6.2 Implementation

6.2.1 Commencement

As a new framework, it would be appropriate that there be a reasonable period of time from the commencement of the enabling legislation and the points at which the obligations become legally binding. The television prominence framework provided for a period of 18 months. That is, it only applied to regulated television devices that were manufactured and supplied in Australia from 18 months from the point at which the enabling legislation commenced. Although this would depend on the final form of the legislation passed

by the Parliament, it is intended that a similar transitional arrangement would be adopted for the radio prominence framework. Transitional issues and provisions

6.2.2 Barriers and risks

There are a number of risks that could impact the extent to which the preferred option (Option 2a) is able to achieve the stated objectives:

1. Ineffective regulation: benefits for users are not achieved as the regulation is not effective in increasing the accuracy rates of voice requests for Australian radio services on smart speakers
2. Higher than anticipated costs: the direct and indirect costs on businesses are higher than expected
3. Delayed compliance: the framework is slow to deliver the intended outcomes.

Strategies to mitigate and manage these risks are set out in Table 14 below.

Table 14: Strategies to manage each risk category

Risk	Mitigation strategies
Ineffective regulation	Pending the passage of enabling legislation, it is intended that the framework would provide the regulator with appropriate powers to oversee and enforce the framework, utilising to the fullest extent the existing graduated enforcement regime in place for most elements of the *Broadcasting Services Act 1992*. In addition, if the statutory review is conducted at a relatively early point following the commencement of the framework, this would provide an opportunity for an assessment of the effectiveness of the framework and the need for any adjustments.
Higher than anticipated costs	Pending the passage of enabling legislation, it is intended that the framework would provide the ACMA with reporting and information gathering powers. This would provide an opportunity for the regulator to assess any impacts (or claimed impacts) at an early point following the commencement of the framework. The statutory review would also provide another mechanism to examine the impacts of the framework, including any costs for industry.
Delayed compliance	Through the introduction of the television prominence framework the ACMA engaged extensively with relevant industry stakeholders to outline the requirements of the new framework. It is anticipated that the regulator would adopt a similar education role in the early phases of the introduction of the framework to help to mitigate any risk of misunderstanding.

7. How will you evaluate your chosen option against the success metrics?

7.1 Evaluation

7.1.1 Evaluation process and timings

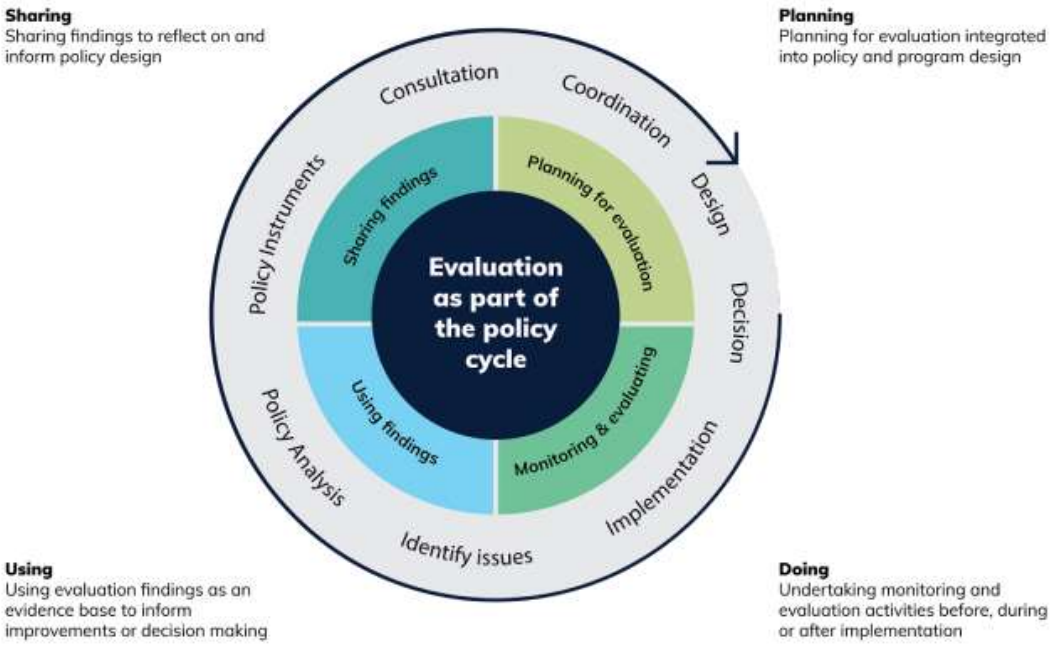
The Government would monitor the framework on an ongoing basis once it is implemented to ensure it is operating as intended. In addition, it anticipated that the Bill would include a requirement for a statutory review to assess the framework's effectiveness and impacts. This would provide an opportunity for a structured assessment of the new regulation; informed by a process of public consultation. Among other matters, it is expected that the statutory review would:

- monitor the ongoing availability of Australia radio services on smart speakers;
- assess the accessibility of radio services on smart speakers; and
- consider the appropriateness of the framework and the and the need for any amendments.

In addition to stakeholder consultation, consideration will be given to sourcing additional data to underpin the statutory review, including commissioned research (as appropriate).

In general terms, these evaluation processes would adhere to the Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts' Evaluation Strategy 2024-27, as set out in Figure 3.

Figure 3: Evaluation as part of the policy cycle



Source: Evaluation Strategy 2024-27 | Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, p. 3

Appendix A – Regulatory Burden Measure

This appendix assesses the regulatory burden for Option 2.[60]

Industry salary costs

Two types of roles were identified as being necessary to undertake relevant tasks:

- Compliance officer[61] – to handle administrative and analytical tasks associated with information gathering and reporting requests from the ACMA, as the regulator for the framework
- Software engineer[62] – to address IT system issues of non-compliance with the core obligations of the framework

The gross salary per additional full-time equivalent (FTE) staff member was estimated to be:

- Compliance officer – $95,287 per year
- Software engineer – $107,307 per year.

Additional non-wage labour costs were included in line with Office of Impact Analysis guidance at a rate of 75% - giving a total annual costs per full-time equivalent staff member of $166,752 for a compliance officer and $187,787 for a software engineer.

Option 2

Three regulatory activities were identified for Option 2a. It is assumed that a compliance officer role would undertake both the information gathering / reporting and the risk assessment / legal advice activities, with a software engineer role undertaking the software / service integration activity. For the purpose of this IA, community stations are assumed to fall into the category of community organisation, while networks of commercial radio stations,[63] the national radio broadcasters (ABC and SBS), the representative body of commercial radio stations (CRA), manufacturers of devices (other than Google, Amazon and Apple), and voice assistant software providers not holding the market share of the top 3 providers (Google, Amazon and Apple), were considered large businesses. Very large businesses were assumed to be the top 3 providers of voice assistant software in the Australian market – Google, Amazon and Apple. These entities are also the major providers of smart speaker devices.

Table 15: Option 2a Regulatory costs estimate based on activity-based costing

Entity type	Number of businesses affected	FTE staff requirement per business	Estimated regulatory impact per year	Notes on estimated additional costs per business type
INFORMATION GATHERING / REPORTING REQUIREMENTS				
Community organisation	1*	0.05	$8,337.60	Assumes 0.05 additional FTE to respond to 1 information gathering or reporting request per year

---

[60] As option 1 represents the status quo, there is no regulatory burden measure to calculate. Option 3 represents a non-regulatory solution to the policy issue. While there may be costs incurred by business and community organisations in implementing the solution, there would be no regulatory requirements for participation, and so no regulatory burden has been considered.

[61] Compliance officer salary in Australia accessed on 17 Dec 2025

[62] Software engineer salary in Australia accessed on 17 Dec 2025

[63] CRA lists 20 networks Find a Station - Network

Entity type	Number of businesses affected	FTE staff requirement per business	Estimated regulatory impact per year	Notes on estimated additional costs per business type
Large business	3^	0.05	$25,012.80	Assumes 0.05 additional FTE to respond to 1 information gathering or reporting request per year
Very large business	3•	0.5	$250,128	Assumes 0.5 additional FTE to respond to information gathering or reporting requests
Total (business)			$275,140.80	
RISK ASSESSMENT / LEGAL ADVICE ON FRAMEWORK				
Community organisation	1*	0.1	$16,675.20	Assumes 0.1 additional FTE to assess risk or legal implications
Large business	3^	0.1	$50,025.60	Assumes 0.1 additional FTE to assess risk or legal implications
Very large business	3•	0.5	$250,128	Assumes 0.5 additional FTE to assess risk or legal implications
Total (business)			$300,153.60	
SOFTWARE / SERVICE INTEGRATION (including 'open pathway' requirement)				
Community organisation	1*	0.2	$37,557.40	Assumes 0.2 additional FTE to facilitate and maintain online service access
Large business	3^	0.2	$112,672.20	Assumes 0.2 additional FTE to facilitate and maintain online service access
Very large business	3•	1	$563,361	Assumes 1 additional FTE to facilitate and maintain online service access
Total (business)			$676,033.20	
ANNUAL TOTAL FOR OPTION 2a			$1,313,897.80	

* Assumes that community radio stations seek CBAA assistance with necessary activities.

^ Assumes that commercial radio networks seek CRA assistance with necessary activities, and that the national broadcasters (the ABC and the SBS) cover their own activities. Device manufacturers are not expected to have compliance obligations under the framework. Non-dominant voice assistant software providers are not explicitly considered in this calculation due to their small share of the Australian market.

•Assumes that this category includes the top 3 providers of voice assistant software (Google, Amazon and Apple).

Given the differences between option 2a and option 2b on core aspects of the framework (payment for prominence; service integrity; access pathway) it is assumed there would be additional FTE requirements for both the information gathering / reporting and the software / service integration activities identified in Table 16. It is also assumed that the software / service integration activities for community and commercial radio services would be reduced under a nominated pathway as these activities would potentially be managed by a third-party aggregator on behalf of the radio services. This RBM does not take into consideration the cost of initial compliance activities that voice assistant software providers would have to undertake to switch from their current methods of surfacing radio stations to a method that integrated nominated pathways of each radio service.

Table 16: Option 2b Regulatory costs estimate based on activity-based costing

Business size	Number of businesses affected	FTE staff requirement per business	Estimated regulatory impact per year	Notes on estimated additional costs per business type
INFORMATION GATHERING / REPORTING REQUIREMENTS				
Community organisation	1*	0.1	$16,675.20	Assumes 0.1 additional FTE to respond to 2 information gathering or reporting requests per year
Large business	3^	0.1	$50,025.60	Assumes 0.1 additional FTE to respond to 2 information gathering or reporting requests per year
Very large business	3•	1	$500,256	Assumes 1 additional FTE to respond to 2 information gathering or reporting requests per year
Total (business)			$550,281.60	
RISK ASSESSMENT / LEGAL ADVICE ON FRAMEWORK				
Community organisation	1*	0.1	$16,675.20	Assumes 0.1 additional FTE to assess risk or legal implications
Large business	3^	0.1	$50,025.60	Assumes 0.1 additional FTE to assess risk or legal implications
Very large business	3•	0.5	$250,128	Assumes 0.5 additional FTE to assess risk or legal implications
Total (business)			$300,153.60	
SOFTWARE / SERVICE INTEGRATION (including 'nominated pathway' requirement)				
Community organisation	1*	0.1	$18,778.70	Assumes 0.1 additional FTE to facilitate and maintain online service access
Large business	3^	0.1	$56,336.10	Assumes 0.1 additional FTE to facilitate and maintain online service access
Very large business	3•	2	$1,126,722	Assumes 2 additional FTE to facilitate and maintain online service access
Total (business)			$1,183,058.10	
ANNUAL TOTAL FOR OPTION 2b			$2,085,622.40	

* Assumes that community radio stations seek CBAA assistance with necessary activities.

^ Assumes that commercial radio networks seek CRA assistance with necessary activities, and that the national broadcasters (the ABC and the SBS) cover their own activities. Device manufacturers are not expected to have compliance obligations under the framework. Non-dominant voice assistant software providers are not explicitly considered in this calculation due to their small share of the Australian market.

• Assumes that this category includes the top 3 providers of voice assistant software (Google, Amazon and Apple).