



# *Debating NBN policy – the influence of issue management*

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*“The NBN project needs, more than anything, an end to  
spin.”*

Minister for Communications, the Hon Malcolm Turnbull MP, 12 December 2013

## **Certificate of Original Authorship**

*I certify that the work in this thesis has not previously been submitted for a degree nor has it been submitted as part of requirements for a degree except as fully acknowledged within the text.*

*I also certify that the thesis has been written by me. Any help that I have received in my research work and the preparation of the thesis itself has been acknowledged. In addition, I certify that all information sources and literature used are indicated in the thesis.*

*Addendum:*

*During the course of the PhD enrolment I have not been a member of any political organisation.*

*All opinions, views, findings and conclusions expressed in this PhD (not referenced as belonging to other individuals or entities) are my own, and not those of any employer I have had during the course of the PhD enrolment.*

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*Date: 31 July 2015*

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## LIST OF ABBREVIATIONS

ABC	Australian Broadcasting Corporation
ACCAN	Australian Communications Consumer Action Network
ACCC	Australian Competition and Consumer Commission
ACIG	Australian Content Industry Group
ACIJ	Australian Centre for Independent Journalism
ACMA	Australian Communication and Media Authority
AFACT	Australian Federation Against Copyright Theft
<i>AFR</i>	<i>The Australian Financial Review</i>
AGD	Attorney-General's Department
AGM	Area General Manager
ALP	Australian Labor Party
Anon	Anonymous
APH	Australian Parliament House
APRA AMCOS	Australasian Performing Rights Association, Australasian Mechanical Copyright Owners' Society
ARIA	Australian Recording Industry Association
ASIO	Australian Security Intelligence Organisation
ATO	Australian Taxation Office
AWU	Australian Workers' Union
BPI	Best Practice Indicator
CBA	Cost-Benefit Analysis
CCC	Competitive Carriers Coalition
CEO	Chief Executive Officer
CEPU	Communication Electrical Plumbing Union
CFA	Country Fire Authority (Victoria)
C-level	Corporate/Executive level within an organisation
CM	Crisis Management
Comms	Communications
Comms Alliance	Communications Alliance
<i>CommsDay</i>	<i>Communications Day</i>
CSG	Customer Service Guarantee
CSIRO	Commonwealth Scientific and Industrial Research Organisation
CSR	Corporate Social Responsibility
CWU	Communications Workers Union
DBCDE	Department of Broadband, Communications and the Digital Economy
DCD	Disconnection Date
DEAN	Data, Evidence and Analysis Network (NSW)
DoC	Department of Communications
DSLAM	Digital Subscriber Line Access Multiplexer
EBP	Evidence-based policymaking

EDM	Electronic Direct Mail
EFA	Electronic Frontiers Australia
<i>Fin Review</i>	<i>The Australian Financial Review</i>
FSLAM	Fibre Subscriber Line Access Multiplexer
FTTB	Fibre-to-the-building
FTTN	Fibre-to-the-node
FTTP	Fibre-to-the-premises
GRS	Graduate Research School
HFC	High frequency cable
HREC	Human Research Ethics Committee
HSB	High Speed Broadband
IABC	International Association of Business Communicators
IAP	Issue Action Publications
IBES	Institute for a Broadband-Enabled Society (changed to MNSI)
ICCO	International Communications Consultancy Organisation
ICT	Information & Communication Technology
IIA	Internet Industry Association
IM	Issue Management
IMC	Issue Management Council (US)
IMT	Issue Management Team
IPTV	Internet Protocol Television
ISO	International Organisation for Standardisation
ISP	Internet Service Provider
ITS	International Telecommunications Society
Journo	Journalist
LIFD	<i>Telecommunications (Low-Impact Facilities) Determination 1997 (Commonwealth)</i>
Mbps	Megabits per second
MNSI	Melbourne Networked Society Institute
MRA	Music Rights Australia
MTM	Multi-Technology Mix
NBN	National Broadband Network (referring to the infrastructure)
nbn	National Broadband Network Company Limited (trading as “nbn”, referring to the company itself)
NBN Co	Previous trading name of nbn
NGO	Non-Governmental Organisation
NSA	National Security Agency
NSW	New South Wales (in Australia)
NZ	New Zealand
OAIC	Office of the Australian Information Commission
OECD	Organisation for Economic Co-operation and Development
op-ed	Opinion-editorial

OTT	Over The Top
PAC	Public Affairs Council
PoI	Point of Interconnect
PLA	People's Liberation Army (of China)
PM&C	Prime Minister & Cabinet
PR	Public Relations
PRIA	Public Relations Institute of Australia
QDA	Qualitative Data Analysis
QoS	Quality of Service
RDA	Regional Development Area
RM	Risk Management
RMCP	Regional Mobile Communications Project
RQ	Research Question
RSP	Retail Service Provider
SAU	Special Access Undertaking
SIM	Strategic Issue Management
SIMS	Strategic Issue Management System
SME	Subject Matter Expert
<i>SMH</i>	<i>Sydney Morning Herald</i>
SSU	Structural Separation Undertaking
SWOT	Strengths, Weaknesses, Opportunities, Threats
Telco	Telecommunications
USO	Universal Services Obligation
UTS	University of Technology, Sydney

## ABSTRACT

Many writers have discussed the merits of evidence-based policy and the deliberative public sphere in which “rational critical debate” determines government policies and decisions. Citizens expect governments to deliver policies that lead to beneficial outcomes for society – not just special interests.

However, media reporting about a proposal or issue and representations by special interests – often referred to as lobbying – can affect policy development and political decision-making; and this was demonstrated in interview data for this study.

The practice of “issue management” (IM) involves PR and specialist public affairs practitioners employing practices to “manage” issues “behind the scenes” and/or in the media, for example, using agenda setting, priming and framing. Yet there has been limited study of these invisible forces and their influence on public debate and related policy outcomes.

This study used in-depth interviews to examine the practice of IM in PR and public affairs, in the context of a case study – the National Broadband Network (NBN). It largely confirms existing IM theory, and its applicability in a public policy context, finding that IM is practised across roles and levels within organisations involved in the debate. IM was seen to directly influence policies, including the underlying NBN policy initiative, and the move to a “must-opt” position on battery backup. Policy practitioners were able to use IM to place policy ideas on the public agenda and to create the necessary conditions for policy change.

The study expands on existing public sphere theory, by tracing the impact of IM on public debate, society and democracy – within the bounds of the NBN case study – finding that the influence of IM is likely to be more far-reaching than has hitherto been acknowledged.

Data analysis revealed that making submissions, utilising research, providing information and conducting in-person meetings were common IM practices employed by issue managers in the NBN debate. Analysis revealed that providing one-to-one briefings and making submissions were both effective in influencing policy processes – and in the case

of submissions, this also held true for organisations that were otherwise outliers on the data.

This study assesses IM lifecycle and practice models in light of the findings, expands on existing theory of IM practice, and considers the application of these models in an Australian public policy context. The profile of the NBN, and the breadth of public policy issues it involves, also means the study has transferability to other cases in a similar context.

## 1. INTRODUCTION

This study examines the practice of “issue management” (IM) and the influence of IM on public discussion and debate in relation to major policy, political, economic, social and cultural issues in Australia.

IM is a key task of lobbyists, political advisers, PR and public affairs practitioners (ICCO 2011; Sha 2011). It is widely discussed in literature on PR and public affairs, and has been identified as one of the fastest growing areas of PR (ICCO 2011). Yet there has been limited examination of IM outside of disciplinary and professional practice studies in PR, public affairs and corporate communications.

IM’s influence is not always obvious to stakeholders because it can take place “behind the scenes”. In fact, as a number of media scholars and journalists note, PR work can be ‘surreptitious’ (McChesney 2013, p. 58), ‘mostly unknown’ (Turow 2011, p. 560), and ‘invisible’ (Cadzow 2001, p. 20).

This study shows that IM engages in processes of *framing* and *priming* issues in the public debate, and can *set* or at least *influence the agenda* in relation to political, economic, social and cultural issues. However, these processes and effects have not been closely examined in communications and media studies, politics, or in discussion of the public sphere. Questions of whether IM may also influence policy, and if so, to what extent, have also not been adequately explored.

This study uses the NBN as a case study, because this major national infrastructure project provides an excellent site for exploring myriad issues that have arisen and have been “managed” by government agencies, political offices, industry bodies and telecommunications companies across Australia.

However, this study is not about the *comparative merits* of particular NBN policy settings – although this discussion is referenced on occasion where it provides context for understanding the IM practices used. Broadband is likely to remain on the Australian agenda: a recent global assessment found that Australia’s average connection speed is ranked 44<sup>th</sup> in the Asia-Pacific region (Akamai 2014).

In comparisons with other high-level public policy issues, a recent report found that ‘the NBN has been a significant story over the last 5 years in the mainstream media’ (IBES 2014). The NBN is the largest infrastructure project in Australia’s history (nbn 2013), and is an ongoing political and election issue. It arguably has been and will continue to be the subject of extensive media coverage and public policy discussion – providing a rich source of information for this study. This material complemented and contextualised data gathered through interviews with those who were involved in seeking to influence public debate and policy in relation to the NBN.

This study:

- informs communications and public affairs practice, particularly in the technology sector
- contributes to scholarly research in public affairs, IM and policy
- uncovers new knowledge about interactions between IM and policymaking
- exposes facets of policymaking that are not always subject to academic and public scrutiny, and
- develops transferable policy insights for future large-scale projects and their policy settings.

## 2. DEFINITIONS

This chapter establishes basic definitions for key terms used in this study, focusing on “issue” and “issue management”, the definitions of which are frequently debated (Jaques 2009). The chapter also considers key IM practices, as set out in the literature (Chase 1984; Heath 2013; Jaques 2014).

### 2.1 “Issue”

Defining an “issue” for the purposes of analysing IM is difficult, not only because of the cross-disciplinary nature of IM, but also because the term means different things to different scholars and practitioners – even within the same discipline. As Jaques notes, ‘It is not easy to agree on defining exactly what an issue is. But for organisations that find themselves facing an issue, they “know it when they see it”’ (2014, p. 3).

A common approach to defining an issue from an organisational perspective is to look to a ‘gap between corporate practice and stakeholder expectations’ (Regester & Larkin 2008, p. 44). Dougall, an Australian writer, similarly defines issues as ‘controversial inconsistencies caused by gaps between the expectations of corporations and those of their publics’ (2008, p. 2).

Building on their gap-based definition, Regester and Larkin (2008) write that an emerging issue is ‘...a condition or event, either internal or external to the organization, that if it continues will have a significant effect on the functioning or performance of the organization or on its future interests’ (p. 44). Heath (2002, 2013) reflects this approach, as do Nicholls and Glenny (2005), who developed their definition in the context of IM surrounding the Canberra bushfires of 2003 (see **Appendix 1 – IM case study comparisons**).

Sethi (1975) originally developed the expectancy gap concept, which features more recently in the work of Regester and Larkin (2008) and Heath (2013). This gap is also known as a “legitimacy gap” (Heath 2013; Langer 2008), and it relates more broadly to questions of corporate social responsibility (CSR) and the ethics of IM:

Legitimacy gap theory is tied to the broader concept of issue management and social contract theory, which posits that organizations are bound by social contracts

to conduct socially desired actions in return for approval of their objectives and other rewards. (Langer 2008, p. 2687)

The gap concept is helpful in explaining what an issue is in an IM context. However, it is arguably too simplistic as a standalone approach, and in the context of public policy issues – the subject of this study – a public policy issue could arise that would affect an organisation’s interests but, at that early stage, not involve a “gap” in the sense described by IM theorists.

Chase and Jones (1979) and Crable and Vibbert (1985) located IM within a public policy context, noting the need to monitor changes in the organisation’s environment to detect issues early: ‘The adversaries of the modern corporation may be skilful in setting the public policy agenda, but issues do not evolve overnight... An issue is an unsettled matter which is ready for decision’ (Chase & Jones 1979, p. 11).

Other approaches to defining issues in Heath and Coombs (2006) and Jaques (2014) include those based on: the expectation gap; disputation or controversy, where an issue emerges from a contestable difference of opinion or public dispute between parties; and impact, where there is a significant impact on the organisation. Jaques favours a definition based on the impact theme, saying:

An issue is any trend or development—real or perceived—usually at least partly in the public arena which, if it continues, could have a significant impact on the organisation’s financial position, operations, reputation or future interests, and requires a structured approach to achieve positive, planned outcomes. (2014, p. 4)

This approach can take IM beyond its corporate origins; an underlying contention of this study is that IM practices are used more widely now than commonly appreciated in the PR and policy literature. It follows that answering the research questions (RQs) called for a more flexible definition of “issue”.

Many types of issue are managed as part of IM, but this study focuses on issues relating to matters of public policy, which are often the subject of debate. For example, taxpayers and stakeholders may expect that a ministerial office was building the NBN with the most cost-effective technology. If the chosen technology does not appear to be the most cost-

effective, an issue could arise as a result. This issue may be reported in the media and gain traction, even if it is based on a factually incorrect perception. As Jaques reflects:

An issue may not necessarily be 'real'. There is an old saying in public relations that 'perception is reality' and this applies nowhere more so than in issue management. Belief in an issue—even if it is false or doubtful—can create just as much public concern and consequent demands for action as one founded on solid fact. (2014, p. 5)

L'Etang (2008) defines an issue as 'a topic of debate, a trend or a recurring theme that moves from the private sphere into the public sphere and on to the media agenda' (p. 75). In a political context, an issue can be the outcome of a political process: an opposition seeks to create an issue in order to give it political leverage over the government.

Drawing on L'Etang's work, issues can be internal or external to an organisation, or both – although the focus for this study is on externally facing public issues with a policy component – and they can be local, national or global (Howell 2009).

After considering the foregoing definitions, in particular those proposed by Chase and Jones (1979), Regester and Larkin (2008), and Jaques (2014), an "issue" for this study is defined as:

*An unsettled matter, condition or event, internal or external to an organisation, which has the capacity to have a significant impact on the functioning or interests of the organisation.*

This definition encompasses the development and impact of an issue on an organisation, and it reflects other policy issue oriented definitions put forward by Hainsworth and Meng (1988) and Harrison (2008). It is also supported by the work of Wartick and Mahon (1994), L'Etang (2008) and Heath and Palenchar (2009).

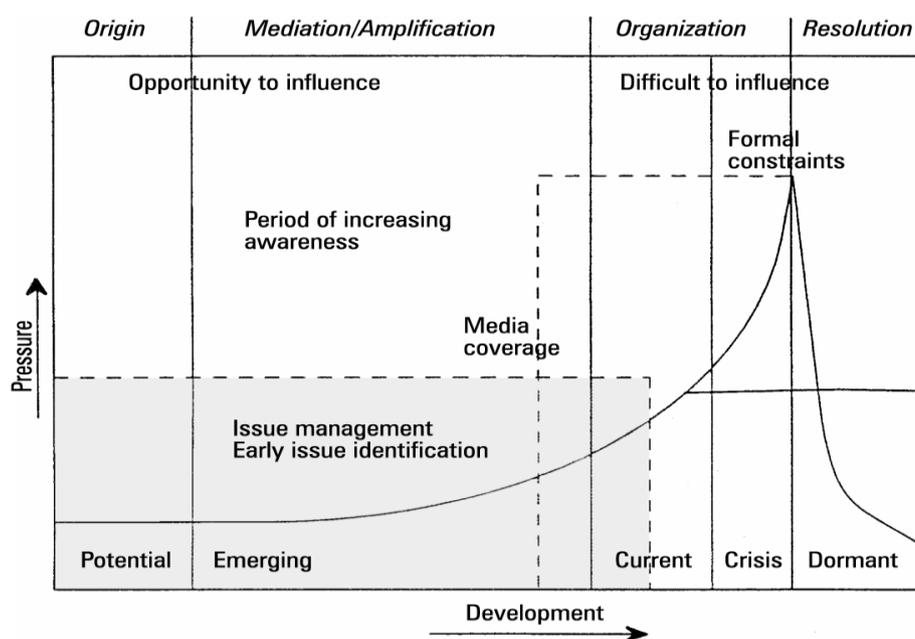
Drawing on Heath (2002) and L'Etang (2008) and their writing on IM, this definition encompasses notions of contestable matters and public debates that affect an organisation – as an unsettled matter will often also be associated with a debate. This

was evident on the interview data and reflected in media analysis regarding the NBN issues examined for this study.

While broad, this definition has been developed specifically for application in an IM context – not beyond that, and only to issues that have public affairs and policy dimensions. See **Appendix 2 – Definitions summary** for key terms used in this study.

Additionally, the term “organisation” in this study applies to political offices, political parties (Reynolds 1997), industry associations, lobbying agencies and consultants, activist and advocacy groups, government departments and agencies, and non-governmental organisations (NGOs).

In researching this study it was found that the concept of an “issue lifecycle” assisted with understanding the work of issue managers. Hainsworth (1990b) and Meng (1992) developed a widely cited model, reproduced below in Figure 1.



**Figure 1. Hainsworth & Meng issue lifecycle**  
*Source: Regester & Larkin (2008, p. 50), based on Hainsworth (1990b) & Meng (1992)*

In a public policy context, a ‘public issues life cycle’ was first proposed by Post (1978), and favourably referenced in McGrath, Moss and Harris (2010). It involves four stages:

1. changing public expectations
2. political controversy
3. development of legislation, and

4. government litigation.

While arguably dated, Post's lifecycle model can still be applied to the progress of NBN policy, although Post's analysis comes from a business rather than a communications perspective. Updating Post's model for public issues, Buchholz (1988) and Lerbinger (2006) suggest four stages:

1. emerging issues
2. public involvement
3. legislative, and
4. regulation/litigation.

Many issues under consideration for this study did not involve changing public expectations, as identified in Post's model, so this study mainly drew on Lerbinger's approach (2006). The movement of issues across lifecycle stages was ascertained from interviewees and from textual analysis of secondary sources, including selected media reports, blog discussions, and formal submissions and publications from participants in the public debate.

Nasi et al. (1997) prepared a comparative table showing issue stages under various issue lifecycle models, reproduced at **Appendix 3 – Issue lifecycle comparisons**.

There has been both litigation and extensive regulatory response in relation to the NBN issues under consideration here. Two prominent and more recent issue lifecycle models that both indicate similar stages are shown overleaf in Figures 2 and 3.

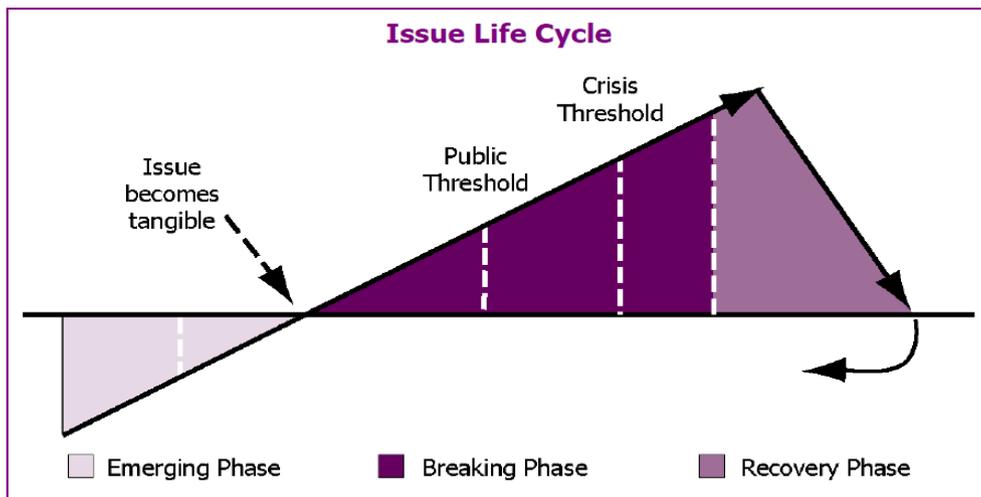


Figure 2. Palese & Crane issue lifecycle  
 Source: Palese & Crane (2002a, p.7)

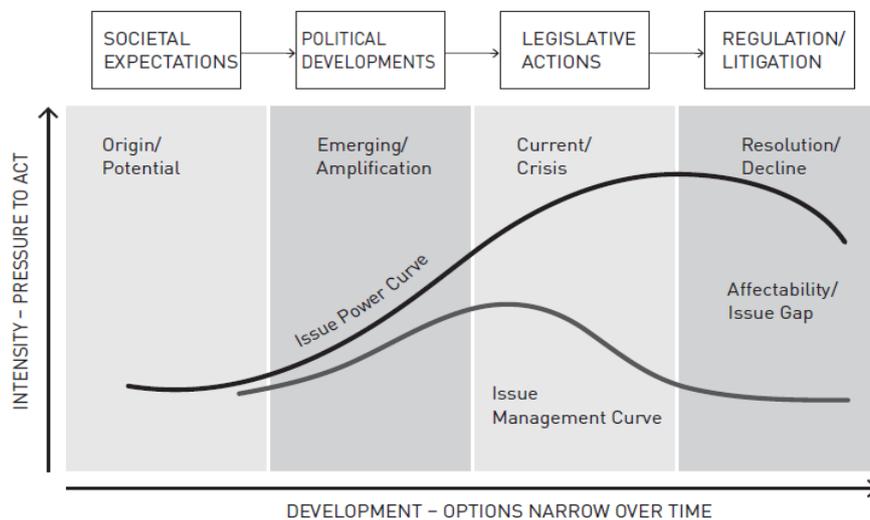


Figure 3. Jaques issue lifecycle  
 Source: Jaques (2014, p. 38)

## 2.2 “Issue management”

IM grew from practical efforts by corporations to manage public affairs, policy and media issues (Chase 1984). However, there is ‘definitional quicksand’ (Jaques 2009, p. 285) in attempting to define IM today. The following section considers various definitions proposed by Chase (1982), Dougall (2008), Heath and Palenchar (2009), and Jaques (2009, 2014), ultimately developing a definition for application in this study.

Chase provides a starting point.

Issue management is the capacity to understand, mobilize, coordinate, and direct all strategic and policy planning functions, and all public affairs/public relations skills, toward achievement of one objective: meaningful participation in creation of public policy that affects personal and institutional destiny. (1982, p. 1)

In his more recent discussion of IM, Macnamara (2012a) draws on and critiques Harris' (2005) conception of the *objective of IM*, which Harris sees as to 'shape and respond to public policy for the benefit of the organization' (p. 98) – reflecting narrow corporation-centric understandings of IM put forward by Hainsworth and Meng (1988).

IM arguably requires a broader understanding of an organisation's environment, taking account of economic, political, social and environmental factors (Regester & Larkin):

Issue management involves looking into the future to identify potential trends and events that *may* influence the way an organization is able to operate but which currently *may* have little real focus, probably no sense of urgency and an unclear reference in time. (2008, p. 44, italics in original)

This study uses a public policy definition rather than a more inwardly focused corporate conception of IM, or one that takes an 'internal process approach' (Jaques 2014, p. 30). The primary focus is outwardly directed IM. Internal process definitions of IM are useful in explaining how organisations manage internal aspects of issues that also have a public dimension. However, prominent internal process definitions put forward by Wartick and Rude (1986), Tucker, Broom and Caywood (1993), and Renfro (1993), primarily focus on corporate management and strategy (Jaques 2014). The literature indicates that many corporate issues managed using IM do not have a public policy dimension at any stage in their lifecycle.

While some issues arise within an organisation, then move into the public sphere and onto the public agenda, the issues discussed in this study often begin in the public sphere – external to the organisation – and can be sparked by political or activist actions. The public or media spotlight can be shone on an organisation, and a stakeholder expectation gap may emerge between what the organisation is doing and how its stakeholders, and activist publics, expect it to act.

Proponents of strategic IM (SIM) say an organisation can achieve positive change in its favour and further its interests. This can be done by using IM practices to intervene in the organisation's broader regulatory, economic, social or political environment (Perrott 1996, 2011; Zhang 2013).

However, organisational strategy, while demonstrating rationality, is also irredeemably social, organisational and political in orientation (Clegg 2012), so this study considers SIM and IM strategy critically and within their broader contexts.

Discussing the relationship between strategy and power, Clegg argues that:

Strategy, in practice, constructs that which is its object through means of accounting for, normalizing and representing phenomena as objects of strategy... the concept of performativity offers itself as a useful analytical tool to grasp the relationship between strategizing, discourse and power. (2011, p. 138)

The public policy approach to IM is also reflected in Reynolds (1997) and Heath (2002), who reviewed the development and future of IM and its links to the broader policy environment, noting that:

...the essence of strategic issues management has been the engagement of public policy battles to foster guidelines and policies that would allow and foster corporate growth... strategic issue management is engaged in public policy power resource management. (Heath 2002, p. 211)

Macnamara notes the inward focus of many IM definitions, which focus on the 'benefit of the organisation' (2012a, p. 294), rather than considering the broader interests of society or of the wider public. This is also evident in Heugens' approach (2005).

Heath and Nelson (1986), proponents of 'harmony theory', perceive a requirement to bring about a 'harmonizing [of] corporate interests with the public interest' (p. 139) in the context of IM and CSR – although they go on to concede that it would be difficult for corporate executives to objectively assess what that public interest would be.

Given broader questions about the effect of IM on democracy, public debate and the public sphere, IM practitioners should arguably consider broader societal considerations, in the same way that ethical practice is often emphasised in teaching PR. This study

advances that discussion, and considers potential positive or negative effects of IM on public debate, and how the IM activities of a public or private sector organisation could be bounded by CSR obligations.

Heath and Coombs provide an additional definition that purports to encompass this broader understanding of IM:

Issue management is the management of organisational and community resources through the public policy process to advance organisational interests and rights by striking a mutual balance with those of stakeholders and stake seekers. (2006, p. 262)

However, other IM definitions – and Jaques’ writing on practical experiences of IM – indicate that the public policy process is not usually used as a medium through which to manage organisational resources. Indeed, interview data gathered for this study shows that IM can be used to shape or even circumvent public policy processes.

The organisation, CEO or issue managers are able to directly manage organisational resources, with a view to influencing public policy processes. It is seldom a question of enforcing organisational *rights*, but more one of furthering organisational *interests*. In this study, a regulatory or legal change in an organisation’s favour is also regarded as a policy outcome.

Issue managers may be public affairs or PR advisers, communications executives, political or policy advisers, CEOs, or other individuals within an organisation who are undertaking IM.

In addressing criticisms of IM – including arguments about “management faddism” – Jaques posits that the ultimate role of IM may be determined ‘not by community and activist groups, but by corporate managers’ (2012, p. 42). Data gathered for this study supports the view that successfully employing IM to advance organisational interests in relation to a public policy matter may not involve striking a balance between the organisation and its stakeholders. Instead, IM can be used to manipulate the debate to secure an imbalance that furthers the organisation’s interests ahead of other stakeholders – remembering that the organisation is also a stakeholder.

IM theorists acknowledge this potential for manipulation (Brown 1979; Regester & Larkin 2008). A cynical reading of IM practices suggests that on some occasions, the greater the resulting imbalance the more successful the issues intervention – so long as ongoing IM can be employed to prevent recurrence.

Commentators have pointed to perceived ‘deceptive issues management tactics’ in the context of inoculation theory and protecting corporate credibility, pointing to the Tylenol responsible dosing campaign as an example (Veil & Kent 2008, p. 399).

In 1986, in the context of IM and CSR, Heath and Nelson wrote that ‘no company can unfailingly *manage* public policy issues, but companies can participate in the resolution process’ (p. 139, italics in original). More recently Heath (2013) discussed the extent to which an organisation is able to proactively influence issues, and how this is reflected in various definitions. Heath notes Jaques’ comments in 2010 that ‘issue management is not about how to manage an issue, but how to manage because of an issue’ (Jaques 2010, p. 435) – although this is not borne out by the findings in this study.

Heath views Jaques’ reformulation of IM in this context as ‘crucial’ to the ‘evolution of the discipline’ (Heath 2013, p. 391). However, this could be interpreted as a narrowing of the scope of IM – where an agency looks to the effect on its business, rather than how it may change the course of the issue.

Any advancement of the field of IM needs to successfully reconcile IM, crisis management (CM) and risk management (RM). From the literature, aspects of IM have increasingly been subsumed within fields of CM and RM, with overlaps acknowledged by writers (Heath 2013; Jaques 2014). Although IM theory is the predominant theory applied in this study, CM and RM both inform the analysis.

Howell’s in-depth analysis of the origin and definition of “crisis” in 2003, which encompassed a review of leading definitions, found that crisis variously means emergency, disaster, tragedy and accident. Howell preferred the definition posited by Seeger, Sellnow and Ulmer (1998): a crisis is ‘a specific, unexpected and nonroutine event or series of events that create high levels of uncertainty and threaten or are perceived to threaten an organization’s high priority goals’ (p. 233).

With reference to prominent theorists, Howell decided on an 'issue-based' view of crisis, which acknowledges that 'a crisis can occur from both threats and opportunities that the organisation encounters, arising from either internal or external issues' (2003, p. 35). This study adopts Howell's approach to defining CM, with the view that a crisis can emerge from both threats and opportunities.

Jaques sees 'issue management serving as an active contributor to both pre- and post-crisis management' (2009, p. 285). For Jaques, IM and CM are 'intimately linked – in theory and also in practice' (2009, p. 285), a sentiment reflected by other analysts (e.g. Galloway & Kwansah-Aidoo 2005), who view IM and CM as part of the same 'process continuum' (Jaques 2009, p. 283).

Over time, Jaques appears to have shifted his own emphasis from IM to CM: for example, one of his more recent publications is tellingly titled 'Is issue management evolving or moving towards extinction?' (2012, p. 35). Howell notes that 'while not all issues can be resolved prior to the onset of a crisis situation, an issue ignored is a crisis ensured' (2014, p. 185). See **Appendix 4 – Crisis and risk management** for a more detailed discussion of the role of CM and its bearing on this study.

Griffin recently noted that, in a practitioner context, 'many external issues centre on an actual or perceived risk. The external drivers of these issues are asking: "Do you know the risks associated with these developments/innovations?"' (2014, p. 44).

ISO defines risk as 'the effect of uncertainty on objectives', and RM as 'coordinated activities to direct and control an organization with regard to risk' (2009, pp. 9, 10). Heath endorses an approach that sees RM as 'traditionally defined by uncertainty: what can happen, at what probability, to which risk bearers, in what way and when, and to what magnitude?' (2013, p. 392). These component elements of risk are also central to IM models that aim to categorise issues according to likelihood, timing and impact (Fink 1986). Specifically, *probability* maps to likelihood, *when* maps to timing, and *magnitude* maps to impact (see Table 2 in Section 8.2.2).

Given that some models for RM practice can resemble those designed for IM, it is unsurprising there can be confusion among commentators and practitioners about the boundaries of IM, RM and CM (Galloway 2006b). In the Australian public sector, RM (and

to a lesser extent CM) has become dominant in some government agencies: for example, in NSW it is built into Treasury guidance TPP 09-05 which all NSW Government agencies are obliged to follow (NSW Treasury 2009).

By not accounting for communications and public affairs components, this guidance may be unable to help agencies and policy practitioners fully manage risk. TPP 09-05 is more business process and procedurally oriented, and does not account for the broader context drawn in by a communications approach.

Galloway provides a definition that this study adopts, along with that provided by ISO, to understand risk, and its relationship with IM in a policy context:

In businesses, “risk management”... describes attempts to drive operational, market, financial and legal vulnerability as close to zero as possible. Here risk may be either an assessment of the likelihood that a hazard, or potential source of harm, will produce a tangible threat to wellbeing, or a “manufactured” risk... At a nation-state level, governments use risk approaches to limit the likelihood of citizen activism over disputed policy decisions. (2007, p. 16)

In a public sector context, and with its links to CM, IM is closely tied to RM, as managing issues assists agencies in mitigating or even eliminating risks. Heath (2013) hypothesises that an organisation’s reputation will partly depend on its contribution to ‘society’s collective ability to manage risk’ (p. 389), which emphasises links between IM and CSR; IM is arguably essential to successful management and implementation of a CSR program in order to maximise the positive PR aspects of CSR. Heath views society as ‘organised on the rationale that it serves individual and collective risk management’ (2013, p. 397). See **Appendix 4 – Crisis and risk management** for more discussion of RM and its bearing on this study.

Some commentators refer to *issues management* (Ewing 1987; Heath 2013) in the plural to denote that multiple issues are often managed. However, Chase and Jaques use the singular term *issue management*. The plural reference may better account for the ‘interaction that goes on between one issue and another’ (Mahon & Waddock 1992, p. 22), but *issue management* does not exclude this interaction, and so the singular is used in this study.

Data gathered for this study demonstrated linkages and interactions between issues – for example the digital divide and how the NBN should be built, the discovery of asbestos and delays with the rollout, and competition protection and the structural separation of Telstra.

IM writers such as Solaski (1995) note issues interaction for public policy issues: ‘public issues do not exist independently of one another’ (p. 7). A public affairs practitioner will usually manage multiple related or interconnecting issues together, as in reality they affect each other. To provide focus and depth, this study examined IM of one issue at a time, rather than focusing on the interaction of issues (although that is an interesting, albeit complex, aspect of IM).

Jaques proposed the following definition of IM: ‘A coordinated cross-functional effort to identify, prioritise and actively manage towards resolution those developments that most impact the organisation and where there is a capacity to make a difference’ (2014, p. 8).

Because this definition draws on Jaques’ definition of “issue”, it differs from the definition used in this study. This study identifies that IM goes beyond “developments” to include “unsettled matters” and “conditions”. Furthermore, IM not only covers developments that most impact an organisation, but also myriad factors that could individually have low impact, but must still be managed at some level. Together these apparently low-impact issues could have significant impact.

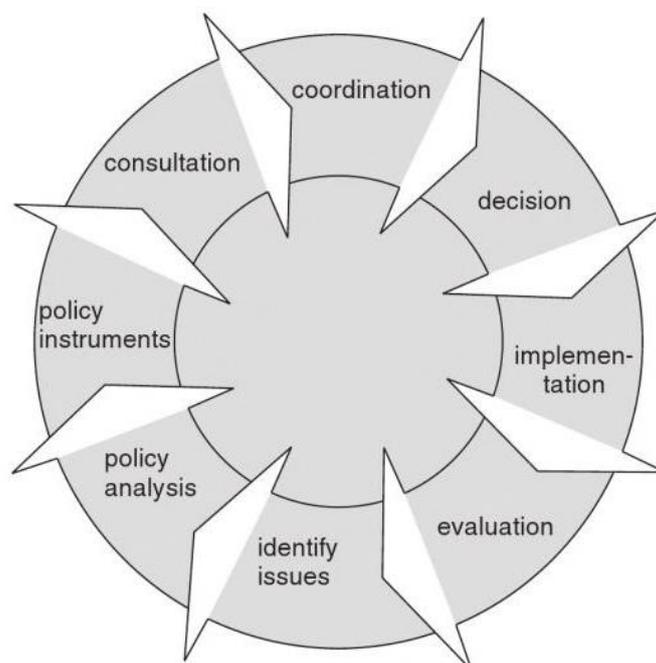
To retain a more discrete focus, while drawing on the diverse literature, this study uses the following definition of IM in a public policy environment.

*IM is the marshalling and deployment of organisational resources, successful or otherwise, to influence the development or course of an issue that has a public policy dimension – through media representations and/or other means – in order to achieve an outcome in the instigator’s favour.*

See **Appendix 2 – Definitions summary** for key terms used in this study.

There are “touch points” in a policymaking cycle or process at which an issue manager may affect the eventual policy outcome. The Davis Policy Cycle (Althaus, Bridgman &

Davis 2013), a frequently cited Australian model, suggests a process comprising the following steps, beginning with 'identify issues' (see Figure 4 below).



**Figure 4. Davis Policy Cycle**  
*Source: Althaus, Bridgman & Davis (2013, p. 38)*

This approach had its origins in the Lasswell Cycle (1951), which characterised policymaking as a sequence involving intelligence, recommendation, prescription, invocation, application, appraisal and termination. The “issues” referred to in the Davis Policy Cycle do not directly correlate with the definition proposed in this study – which focuses on issues with a public affairs dimension. However, there is an overlap: for an organisation involved in the public policy debate, a policy “issue” – in the sense used in the policy literature (Althaus, Bridgman & Davis 2013) – may also fit the definition of a public affairs “issue”.

Althaus, Bridgman and Davis argue that the cycle begins with the genesis of an “issue” on the policy agenda:

When an issue is identified, it becomes part of the policy cycle, subject to analysis, policy instrument development and so on round the circle. There is a crucial moment in the policy cycle, a point at which a private concern is transformed into a policy issue. Suddenly it commands the resources of government while myriad

other concerns languish as merely private matters. No wonder competition among issue advocates is so fierce. (2013, p. 43)

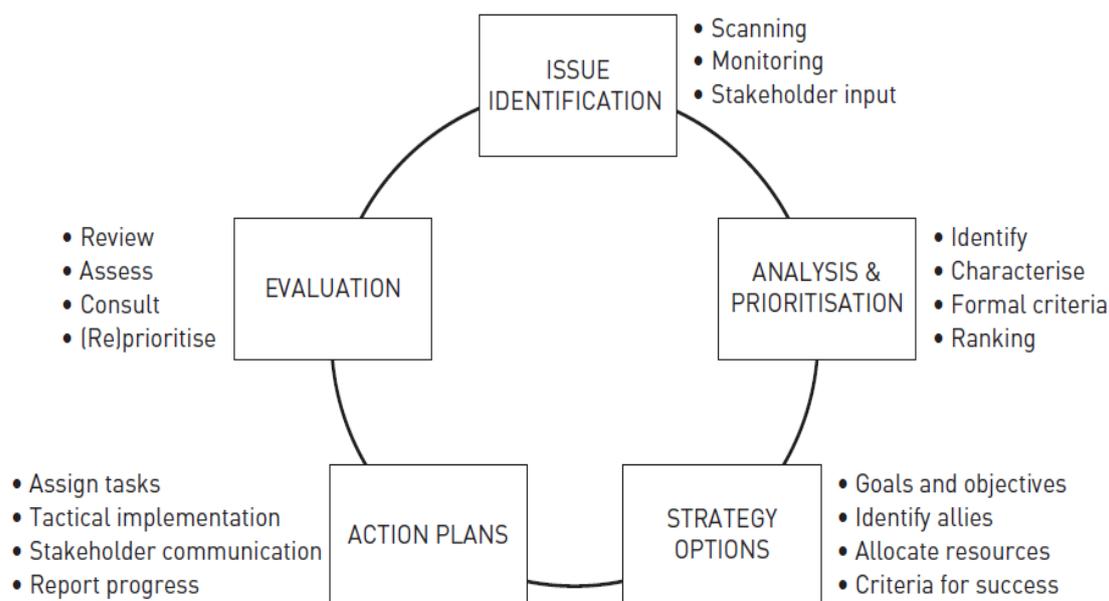
Some commentators, notably Colebatch (2005, 2006, 2009), have criticised the Davis Policy Cycle for impracticality and not reflecting the realpolitik of the policymaking process; Simeon (1976) and Sabatier and Jenkins-Smith (1993) have proposed alternative models. Nonetheless, this study draws on the Davis Policy Cycle because of its prevalence and conceptual clarity, while also referencing interview data that reflects practitioner experiences of how policy processes work, and factoring in impacts of policy communities, policy networks and advocacy coalitions (Pal 2010).

Theorists have proposed models showing IM as a series of steps in response to an emergent issue. Jones and Chase's original IM process model (1977) conceptualised IM as a cyclical process. Palese and Crane, of US-based practitioner group the Issue Management Council (IMC), endorsed this process approach, and developed a simplified four-stage version (2010).

An alternative conception of the IM steps – widely discussed by Grunig and Hunt (1984), Theaker (2001) and Lattimore et al. (2012) – involves seven steps, including 'prioritising' and 'rehearsing' actions. This seven-step approach is less useful for this study because, on the basis of data gathered here, busy issue managers in public affairs environments do not have time for the extra steps outlined.

The additional steps outlined in the seven-step model: 'identifying issue change strategy options', 'rehearsing', and 'evaluating the results', were not commonly reflected in the data. The seven-step model is an ideal type, and the literature on best practice IM suggests an IM intervention can be less effective when individual steps in this process model are omitted.

A table setting out the comparative IM stages is in **Appendix 5 – Issue response models**; it reveals that the various models share much in common, and generally follow a four step approach in line with that proposed by Palese and Crane (2002b). Jaques' recent representation, starting with "Issue Identification", is set out overleaf (Figure 5).



**Figure 5. Common steps in the IM process**

*Source: Jaques (2014, p. 9)*

Jaques also developed a more detailed model (2014) – not represented as a lifecycle – which is provided in **Appendix 6 – IM process flow**.

The IM lifecycle models reflect an accepted view among theorists that ‘the capacity of a public affairs unit to influence an issue diminishes progressively as the issue moves from one stage of its life cycle to the next’, particularly once it crosses the ‘public threshold’ (McGrath, Moss & Harris 2010, pp. 342–344). This is because once it moves into the public arena, sections of the media, including in social media environments, may report or comment on the issue in unpredictable ways. In addition, more stakeholders will become aware of the issue, and may attempt to influence it, creating a more complex situation for an issue manager.

IM is extensively discussed in the PR literature: in a study by Macnamara (2012b), IM was the sixth most commonly discussed PR role and field of practice in PR textbooks. The study found an emphasis on achieving organisational objectives, rather than considering broader societal interests. Furthermore, IM involved communicating with ‘target publics, denoting their conceptualization as the intended recipients of information transmission’ (2012b, p. 390), rather than engaging in a two-way symmetrical exchange.

Heath and Palenchar (2009) view IM through the lens of “issue communication”. They see an organisation’s role as ‘being the first and best source of information on all matters relevant to their organization’ (p. 204). They are also critical of the role many organisations play in IM, drawing on Sethi’s notions of a ‘legitimacy gap’ (Sethi 1979).

Jaques defines issue communication as: ‘An element of the broader issue management process that contributes to and supports development and implementation of the strategic plan, including message development and effective delivery’ (2014, p. 6).

In the context of interviews for this study, IM and issue communication are treated synonymously. To draw a distinction could have caused confusion for interviewees, who were more likely to have heard of IM than issue communication – on the basis of research on related literature. The two concepts overlap substantially, but there is a difference in the communicative emphasis of issue communication. However, it was not expected that this distinction would advance this study.

This study is also informed by significant IM and CM case studies in the literature, involving emergency management (Canberra bushfires of 2003 and the Victorian bushfires of 2009), and the DaimlerChrysler, Fonterra and Federated Farmers of New Zealand (NZ) examples (set out at **Appendix 1 – IM case study comparisons**).

### 2.2.1 Corporate policy

Although the focus is on public policy, there is occasionally a blurring of public policy and organisational policy in the data. nbn is tasked with building the network; since nbn is Australian Government owned, and its policies affect most Australians and their access to the internet, arguably its organisational policies have a public policy dimension, and in many respects are also public policies.

Similarly, Google’s policies are organisational; however, its positions on ICT policy issues such as information privacy, information security and copyright enforcement affect most Australians directly or indirectly because of its widespread use. It follows that although its policies on public matters are organisational, they also have a significant public policy dimension, and this dimension can increase over time.

When nbn is sold and is no longer government-owned, its policies will all be organisational. However, they will still have a public policy effect, given that nbn is the

monopoly wholesale broadband provider in Australia, and access to broadband is a matter of national interest and inherently a subject of public ICT policy. Consequently, this study also considers the use of IM to influence organisational policy, where this enhances the analysis.

Heugens (2005) and Lerbinger (2006) describe the process of organisational policy development from a public affairs perspective. Heugens discusses the 'business policy literature' (p. 493), seeing IM as 'an excellent medium for participating in the public policy process' (p. 495). Drawing on Ashford and Cummings (1983), Heugens highlights the value of organisations seeking feedback on issues:

Feedback-seeking behavior is valuable only if the information obtained through this process is used to make adaptations to both top management conduct and corporate policy, such that the adequacy of these behaviors and policies for attaining favourable organizational outcomes and minimizing threatening issues can be enhanced. (2005, p. 493)

Heugens' organisational issue response model is reproduced at Figure 6 (below).

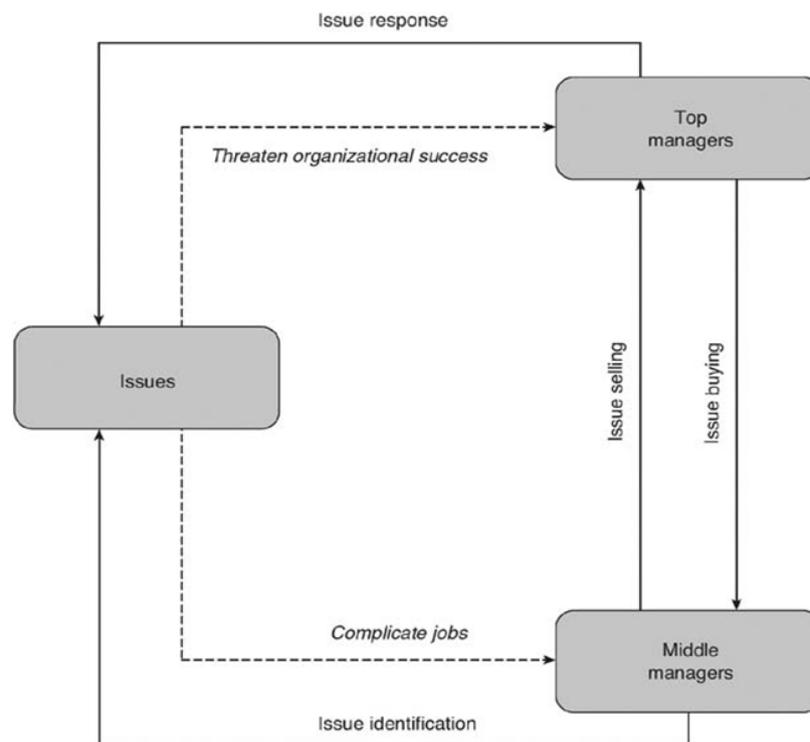


Figure 6. Generic issue management system  
Source: Heugens (2005, p. 490)

This model is focused on an organisation's internal approach to an issue, and so it differs from the other models outlined in **Appendix 5 – Issue response models**. Heugens' more managerial model provides a working explanation of the internal development of policy at large organisations such as nbn and Telstra.

Lerbinger's approach is US-centric, but still useful when examining IM in an Australian context. In describing corporate public policy, he recognises that it overlaps with public policy existing wholly outside of the organisation:

Public affairs extends beyond government relations because it entails a role in the public policy process larger than that of influencing legislative and regulatory decisions. It refers to all of the various ways public policy is made in our society to address the concerns of society.

Thus a corporation may decide to work out its own public policy solution with stakeholders by voluntarily changing its corporate policies and behavior by negotiating with stakeholders to arrive at a mutually acceptable solution. These solutions can be seen as an alternative public policy process to that of government and may occur at any of the three stages in the life cycle of an issue. (2006, p. 15)

The interview data confirmed this, particularly regarding nbn and Telstra's policy development in relation to build issues such as asbestos handling and the installation of backup batteries (Anon 8, Anon 14 – see p. 103 for an explanation of the use of "anon", Kaiser). It follows that some issues are matters of purely internal organisational policy, and others have crossover organisational and public policy dimensions (e.g. asbestos). This study, where it examines organisational, "business" or "corporate" policy (Heugens 2005, p. 493), focuses on the latter dimension.

### 2.3 IM practices

IM practices studied were initially drawn from the literature – especially from Palese and Crane (2002b), Dougall (2008), Heath and Palenchar (2009) and Jaques (2014) – and were refined and expanded during the study. A high-level taxonomy of practices was developed, and also drawn on to develop the initial nodes list as shown in **Appendix 7 – IM practice taxonomy**. Thus, the interviews were approached with a basic understanding of the kinds of IM practices likely to be used in a public policy environment.

Scholars writing from a managerial perspective sometimes refer to IM or public affairs “tools” (Showalter & Fleisher 2005) – as did some interviewees for the study. Adopting a political and sociological perspective on IM, this study prefers the term “practices”, which has the same meaning.

The practices considered for this study are not exclusively IM practices. They are used across the gamut of communications and policy fields, but are particularly found in public affairs. They are characterised as IM practices in this study because that is the focus of the examination. However, only communications practices *used in an IM context* were coded in the interview data, not communications practices more generally (see **Appendix 8 – Coding rules**).

The study does not “claim” these practices as IM practices; indeed, it draws comparisons with their use in other contexts in order to better understand their impact on the public sphere. For example, if this study had chosen to investigate the phenomenon of stakeholder engagement, many of the practices considered here could be regarded as *stakeholder engagement practices* – and the data ultimately demonstrated that many IM practices include a stakeholder engagement element.

This chapter has set out key definitions of “issue” and “issue management”, reviewing the most prominent definitions and establishing new ones that apply in a public policy context. Refer to **Appendix 2 – Definitions summary** for definitions of key terms used in this study. To understand in greater detail how IM operates in practice, it is also useful to consider the widely cited case studies described in **Appendix 1 – IM case study comparisons**.

### 3. LITERATURE REVIEW

This chapter reviews the existing literature on IM, contextualising IM within broader public affairs and PR literature, beginning with a focus on the phenomenon being studied. Many IM theories are underpinned by the concept of a “legitimacy gap”, which is explored here. Finally, the chapter considers the broadband policy context and identifies the gap in knowledge.

#### 3.1 The phenomenon being studied

Prominent IM writers whose work informs this study include Hillman (2001), Bronn and Bronn (2002) and Oliver and Donnelly (2007). More specifically, Roper and Toledano (2005) reviewed the IM landscape, analysing the use of IM by the Federated Farmers of NZ in relation to that country’s ratification of the Kyoto Protocol (see **Appendix 1 – IM case study comparisons**). Roper and Toledano were critical of IM’s role, given its failure to recognise a key stakeholder – namely the planet.

In assessing the efficacy of the IM practices identified in this research, it is also worthwhile considering leading professional bodies that claim to be sites of best practice. In the US, IMC affiliates including Palese and Crane were at the forefront of the development of IM for practitioners. However, the IMC has its detractors, and there is scant indication of how successfully any of this material has been when managing real-world issues – particularly for Australian issue managers.

Examination of IMC publications suggests a US-centric approach, which could detract from the usefulness of their guidance in an Australian public policy context – given key dissimilarities between US and Australian political environments. The IMC claims a homogenous ‘evolving universal concept of issue management as a strategic and tactical competency of leadership companies’ (Palese & Crane 2002c, p. 2). However, this broad literature review would suggest the nature, definitions and practices of IM are diffuse, even among those who practise it.

Theoretical perspectives through which IM has been examined most recently include systems theory, social exchange theory, rhetorical analysis, issue lifecycle theory, legitimacy gap theory, and powerful stakeholder theory (Grung & Repper 1992; Heath 2009; Jaques 2014; Nasi et al. 1997). IM has also been linked to theories of agenda

setting, priming and framing, which have been employed in this study as primary theoretical lenses to inform the analysis.

An understanding of the *system* of public discourse and debate is helpful in examining the effects of IM on the public sphere. Systems theory can assist with analysing the impact of IM on the public debate, by teasing out how modifying the development of an issue can affect the broader sociopolitical system. The findings of this study are therefore transferable to other Western democratic systems that also have active public spheres, free press, and a similar conceptualisation of public discourse and debate around the political issues of the day.

Systems theory may be applied to gain a better understanding of communications within and between organisations. The role of communications in a systems theory approach is key: 'cybernetics, a subarea of systems theory, suggests that the organization responds to incoming information by either increasing or decreasing the information it projects into the environment' (Bridges 2004, p. 53). As well as viewing organisations as actors within the system, communications could be seen as the primary way organisations affect their systemic environment and make it more conducive to achieving their goals.

Heath (1994, 2009) notes the use of control through cybernetics, which is a shift from the original conception of communications as a two-way symmetrical process (Varey 2002). In this regard, interorganisational communications are only one of many ways these entities may interact, and any model accounting for the role of IM would need to extend beyond merely communicative interactions.

Bridges notes in her review of IM models that the systems theory approach has been criticised for being too simplistic. This may be a consequence of the model's immaturity; if the model can be updated to account for the modern communications environment (including social media), and the viral nature of many communications and issues that agencies face, it may afford additional insights into the effects of IM.

IM literature overlaps with strategic management theory. Perrott (2011) views SIM as comprising eight steps: capturing and listing; sorting and coding; deciding which issues are most important; ranking; identifying; preparing action plans; monitoring progress on implementing action plans; and ongoing issue capture.

Zhang (2013) posits that SIM, particularly in the context of social media, involves four phases:

1. issue fermenting and going viral
2. proactive
3. reactive, and
4. issue receding and new issue fermenting.

Zhang sets out the tactical role of IM practices as part of the proactive and reactive phases. However, Zhang's approach lacks any form of situation analysis; it begins with 'issue fermenting' (p. 1312). For Heath, IM is the 'proactive application of four combined strategic options' (2002, p. 210):

1. strategic business planning – supporting 'strategic planning by keeping it aware of threats and opportunities'
2. getting the house in order – understanding and implementing 'standards of corporate responsibility'
3. scouting the terrain – 'scanning, identification, monitoring, analysis and priority setting', and
4. strong defence and smart offence – 'substance and rationale for issue communication, the organization's voice'.

The element of IM that involves anticipating the future course of issues shares similarities with "future studies" in the field of management strategy. Addressing practitioners, Griffin describes this predictive element of IM:

The first challenge associated with managing external issues is *predicting how, where and when they might develop*. Although these issues are externally driven, the assumption should not be that they are unpredictable. Should, for example, the fast food industry have predicted the emergence of the obesity issue?

One role of the communications professional is to understand how these sorts of issues emerge and develop, and to be the organization's eyes and ears as they start to unfold. This involves stakeholder knowledge and engagement as well as a finely tuned 'radar'. (2014, p. 45, italics in original)

Schwarz (2005) has attempted to synthesise IM with future studies, with a focus on how future studies could make IM more effective and targeted. However, he appears to focus too much on the environmental scanning aspect of IM and not enough on the broader issue lifecycle.

### 3.1.1 Reputation management

Issues can potentially damage an organisation's reputation, and so public affairs initiatives may be designed to maintain and support this reputation. O'Connor defines reputation management as 'the strategic use of corporate resources to positively influence the attitudes, beliefs, opinions, and actions of multiple corporate stakeholders, including consumers, employees, investors and the media' (2005, p. 745).

Data from this study shows that reputation management and IM are interrelated. Griffin discusses the relationship between the two:

A good reputation should be *utilized* – or 'leveraged' – for the achievement of strategic goals. Enlightened organizations can deploy the value of their reputations to create the climates in which they can better perform their core business or purpose. This is done, for example, through policy, positioning and public affairs programmes: making contributions to debates and leveraging relationships and goodwill to influence policy... Apple... has a reputation that gives it access, influence and power. (2014, p. 9, italics in original)

Heath's recent writing discusses the links between issues, reputation and CM, and their combined evolution (2013). He notes the genesis of IM in influencing policy, rather than protecting corporate reputations. In the broader context of this study, data indicating IM influencing policymaking processes, successes and failures, also evinces a return for IM to its policy oriented roots.

Although Heath is writing primarily in a corporate context, many of his insights into reputation management can equally be applied to government agencies. Protecting agency reputation provides a range of benefits. The government of the day will likely perceive the agency positively, and grant the agency continued (or increased) policy responsibility if the agency demonstrates positive policy outcomes.

The government may also protect the agency from damaging future restructures (and support the ongoing careers of agency officers), ensure ongoing funding, and support the agency in developing and implementing future policy initiatives.

In some respects these benefits overlap with those afforded to corporate entities that utilise IM and its positive reputational effects. While in the Chase (1984) or Heath (2009, 2013) context a private sector organisation needs to influence the development or outcomes of policy initiatives, government agencies in turn need to positively manage their own reputations to enhance their policy outcomes – partly through dialogue. As Heath notes, ‘reputation is not sender oriented or agentic alone, but a product of community dialog’ (2013, p. 402).

For the purposes of this study, it is assumed that government agencies seek to operate in the public interest. However, through the policy programs they are required to implement, they can find themselves in a position where they are perceived as no longer supporting the public interest. In NSW, this occurred in 2013 when a perception developed (reflected in media reporting at the time) that the Department of Family and Community Services was not adequately protecting children in state care (Power 2013).

Data on the NBN case study demonstrated that reputational damage for governments can adversely affect policy implementation, which is discussed in more detail in the ensuing chapters. Government can be perceived as less efficient than the private sector at achieving outcomes because they have less of a competitive market incentive. In this regard, government agencies may start from a weaker reputational position, but also are expected to act in the public interest – which can boost reputation.

Reputation is essential to maintaining legitimacy. This is especially the case with nbn as it faced criticism from political, academic and industry sources – as demonstrated in media content analysis conducted for this study. Vaara et al. (2006, cited in Heath 2013) note five relevant dimensions of legitimacy:

1. legitimacy by normalisation, through rendering something legitimate by exemplarity
2. authorisation being legitimation by reference to authority
3. rationalisation is legitimation by reference utility

4. moralisation is legitimation by reference to specific values, and
5. narrativisation is legitimation through telling a story.

This study suggests that issue managers and public affairs specialists employed all forms of legitimation to varying degrees regarding NBN issues. Applying legitimacy concepts helps this study situate the importance of reputation to IM in the NBN debate. Research for this study found that although reputation is often theorised in a corporate context, it equally applies to government-owned agencies such as nbn.

### 3.1.2 Legitimacy gap theory

For a private sector organisation, the legitimacy gap is the difference between how the organisation acts and how its stakeholders would expect it to act. This is equally the case for a public sector organisation.

In the context of this study and in light of the theoretical underpinnings of IM, a legitimacy gap is included in the notion of an “unsettled matter, condition or event”. It follows that the definition applied in this study is informed by legitimacy gap theory, and so it is instructive to consider how a legitimacy gap model applies in the context of a government agency or statutory body employing IM practices.

Bridges, in reviewing legitimacy gap theory, writes that the discrepancy can result from two situations:

1. An organization has changed its way of doing business or has had an inappropriate behavior discovered.
2. An organization has not changed or [has] been hiding its behavior, but society has changed its evaluation of the organization’s performance... there has been a change of social norms. (2004, p. 58)

In a government context, both of these circumstances can occur to create a legitimacy gap. Government agencies or government-owned corporations such as nbn may find themselves in a position where shifts in ways of doing business affect stakeholders, and result in public criticism. This occurred when nbn removed a large number of premises from its online rollout map (e.g. Turner 2013).

Heath places significant weight on the 'legitimacy gap' notion in IM, viewing this as central to the development of an issue and attendant potential reputation damage (2013, p. 394). He also argues that change management can provide a solution – if the need for change is identified early through environmental scanning, issue communication and CSR.

In Ewing's view, managers must know 'what is going on in all the corporation's relevant environments, the social and political as well as the economic' (1987, p. 2). This view underscores the importance of environmental scanning and the initial situation analysis in a communications strategy or IM strategy – which is also reflected in data from interviewees. Changing perceptions of what is required from government organisations can be influenced by media interventions reporting on organisational performance, or activist stakeholder use of IM.

Drawing on Wartick and Mahon (1994), Nasi et al. (1997) and Heath (2009), Bridges notes that a legitimacy gap can 'develop from problems of facts, values, or policy' (2004, p. 58). Bridges reinforces the potential for issues to develop from policy-oriented expectation gaps. Palese and Crane (2002a) perceive the legitimacy gap as shown in Figure 7 below:



**Figure 7. Gap analysis**  
*Source: Palese & Crane (2002a, p. 3)*

Government agencies, spending public money, work towards furthering the "public good", at the direction of the democratically elected government of the day. For these agencies there is a clear need to avoid any legitimacy gap. A perception of a legitimacy gap can inflict great reputational damage on a government agency, as stakeholder publics hold government agencies to a high standard of accountability by comparison with the standard applied to private corporations.

Bridges notes that 'once an organization's economic and legal responsibilities are met, the higher level responsibilities become more important to society' (2004, p. 58), reflecting on developments in corporate positioning after WWI.

Boyd (2009) notes two aspects of legitimacy: 'in order for an organization to be seen as operating in a manner consistent with social norms, it must be perceived as useful (competent) and responsible' (p. 157). Government agencies have an advantage because where they are delivering services, they are already regarded as at least useful – this is contained within their organisational mandates.

Boyd's (2009) and Heath's (2013) corporate concepts of legitimacy and utility can also be applied to government agencies involved in discussions in the public sphere about the NBN. For example, debate about waning utility has influenced the positioning and constitution of the Commonwealth Department of Communications (DoC), which has undergone restructures in recent years.

It emerged from the interview data that participants in the debate sought to utilise 'legitimation strategies: normalisation, authorisation, rationalisation, moralisation and narrativisation' (Vaara et al. 2006, p. 789). Legitimacy means 'a discursively created sense of acceptance in specific discourses or orders of discourse' (Vaara et al. 2006, p. 793). Government agencies need to establish discourses around their own functions and roles, which research for this study indicates has been a goal for nbn through advertising and promotion of its work.

### **3.2 Public affairs**

From the literature review, IM practices are discussed across communications, corporate communications, public affairs, PR, CM, lobbying, media relations, marketing communications and political marketing literature. In practice, 'issue management is usually driven by communications, public affairs – or a designated team' (Regeister & Larkin 2008, p. 42). This widespread usage of IM means it cannot be characterised as one type of practice, beholden to one field.

Of the many definitions of PR, Harlow's is instructive due to its simplicity: '...a distinctive management function which helps establish and maintain mutual lines of communication, understanding, acceptance and co-operation between an organisation and its publics' (1976, p. 36).

IM is often found within the corporate communications function of an organisation, as organisations strategically communicate with their target publics (Fearn-Banks 2011) via

mass media and various other forms of representation. Macnamara (2012a) reviews common definitions of “corporate communication”, noting that the US definition tends to focus on ‘the public communication of large companies’ (p. 270), whereas in Europe the term has a broader meaning. Macnamara summarises this discussion:

Corporation communication is sometimes used as an umbrella term and the title for an organisation’s public communication, while more commonly it is used to refer to the specialist field of practice focused on the non-marketing communication activities of corporations and other ‘corporate bodies’. (2012a, p. 271)

See **Appendix 9 – Corporate communications** for a detailed discussion of the corporate communications function. This study examines IM as a distinct field, but considers it in the context of overlapping disciplines. “Communications” in this study is ordinarily used in the public affairs sense, not in the technology sense of the word.

Of the fields overlapping or involving IM, public affairs most substantially overlaps with IM in a policy context. It could be argued that IM is a subset of public affairs, although that is not the approach taken in this study, which views IM as its own distinctive practice (on the basis of the literature review). Public affairs and lobbying theorists discuss IM, and scholarship on public affairs, particularly of American origin, typically covers IM as a key element of public affairs practice (Harris & Fleisher 2005; Lerbinger 2006; Thomson, John & Mitchell 2007).

Reflecting differences in their approach to PR, US scholars have tended to come from a private sector standpoint (Tench & Yeomans 2013), focusing on corporate interests. Public affairs research for this study reveals a tendency for European scholars to emphasise public sector concerns and, for example, the need for governments to manage relationships with stakeholders.

Compared to corporate communications, public affairs emphasises public policy aspects more often, within the literature and in practice. Public affairs will often have media management and strategy as a key function, which is not always the case with corporate communications. Research indicated that many corporate communications practitioners contract media liaison or engage PR agencies. However, public affairs practitioners

generally write media releases and plan media events, and can also undertake media training.

Research on existing IM literature (and subsequent interview data) found that public affairs practitioners often adopt a view that incorporates social considerations – whether out of strategic or selfish interests or genuine altruistic concern. Theorists who discuss the ethical implications of PR practice, and the use of codes of practice, include Macnamara (2012a) and Fawkes (2015).

Practitioners often work with government or regulatory bodies, engaging with policy nuances that would arguably not be covered by a corporate communications function alone. Although IM occurs across both corporate communications and public affairs, it is more likely to be situated within public affairs at most organisations; this study focuses on a public affairs approach to IM, rather than a purely corporate communications-oriented approach.

### **3.3 Broadband policy**

Broadband policy forms part of this literature review due to the study's cross-disciplinary approach covering elements of the communications, management and policy fields.

Globally, broadband is 'universally recognized as a key part of 21<sup>st</sup> century infrastructure that can contribute to a country's economic and social development and wellbeing' (Roetter 2013, p. 202). This makes it an area of substantial policy importance for most governments, and much of the literature on broadband policy best practice draws comparisons between broadband infrastructure projects.

Contemporary theorists have set out what they regard as guiding principles for effective broadband policy, and there is extensive Australian commentary on the relative merits of the Liberal and Australian Labor Party (ALP) policies (the Liberal Party and the ALP are the two dominant political parties in Australia). In a comparative study, Roetter (2013) made the following recommendations for broadband policy:

- The roles of government and the private sector must be complementary.
- Effective 'checks and balances to ensure that there is adequate representation of interests on both the supply and the demand or consumption sides' must be in

place, although they can only work if not ‘circumvented by powerful special interest groups’ (p. 202).

- Policy should cover supply, demand, and the development of ‘human capabilities’ (p. 202).
- Government should only intervene where there is market failure, selecting an economically advantageous option.
- Government should maintain technological and network neutrality, and leverage off existing infrastructure.

Falch highlights the need to create a ‘competitive market for the provision of broadband services’ (2007, p. 257). In the Australian example, Gerrand (2014) notes the importance of a wholesale monopoly for nbn, and has criticised recent iterations of Liberal policy on this basis. Writing on findings similar to Roetter’s, Picot and Wernick stress that ‘successful governmental strategies should consider both, public good and competition-related aspects of broadband’ (2007, p. 672).

This study has been informed by NBN policy in other jurisdictions – including the US, South Korea, Israel and Germany. Picot and Wernick found that a range of factors affect broadband deployment and penetration, including ‘the pricing of broadband access, content offerings and distribution, online activities, the role of e-commerce, as well as demographic and educational factors’ (2007, p. 672). They highlighted the role of governments in encouraging regulatory and market environments that facilitate affordable broadband access.

One aim of broadband policy in many jurisdictions is to encourage the take-up and use of higher-speed internet services, based on an underlying assumption that such services enable societal and economic advancement:

In recent years, it has generally been accepted that the development of broadband as a means of promoting new interactive and advanced applications is supposed to be the basis of what are referred to as *knowledgebased* economies and societies. (Cava-Ferreruel & Alabau-Munoz 2006, p. 446)

Governments have taken various approaches to addressing the policy problems associated with broadband implementation, many of which involve difficult choices for

policymakers (Cava-Ferreruel & Alabau-Munoz 2006, Falch 2004). Policymakers have aimed to ensure broadband availability and affordability, and this has been reflected in findings on key messaging from nbn:

I think they took the decision early on that it was better to focus on the ubiquitous nature of the technology, why it was in the common interest to go as widespread as they had planned... to see it as... a nation building exercise. (Anon 2 2014, pers. comm.)

One challenge for policymakers is determining the extent to which the underlying broadband network should be a monopoly, with the aim of avoiding unnecessary and costly duplication of essential infrastructure. This has happened previously in Australia during the 'HFC cable wars' in the 1990s, which Fletcher describes as 'one of the most absurd episodes in the history of corporate Australia... Optus Vision was rolling out cable and Telstra was shadowing its rollout down virtually every street' (Fletcher 2009, p. 38).

Regarding broadband infrastructure as a natural monopoly supports the argument for a fibre-to-the-premises (FTTP) broadband network with one monopoly provider, giving access to retail service providers (RSPs), who can then compete to provide services to the end user. This question also underpins the debate in the public sphere about the extent to which the network should be FTTP or fibre-to-the-node (FTTN).

Analysts have highlighted both supply (infrastructure availability and affordability) and demand factors (service provision, education) in determining broadband penetration and take-up from a comparative policy perspective (Cava-Ferreruel & Alabau-Munoz 2006).

There is broad agreement among commentators, analysts, and political players in the debate that an unfettered market approach is not likely to deliver an optimal broadband internet solution for Australia. The international experience supports this:

As a general consideration, OECD governments recognize the primary role of the market in broadband deployment; however, at the same time, it is generally accepted that public policy has a role in complementing the correct functioning of the market...

Most strategies include actions aimed at guaranteeing the supply of broadband services in underserved areas where market forces do not have enough incentives to invest (*market failure*). (Cava-Ferreruel & Alabau-Munoz 2006, p. 447, italics in original)

In the Australian public debate, Telstra remains the incumbent, with significant market power, and manifest influence in public debate and in national telecommunications outcomes. The building of an NBN in Australia with the Labor government plan could be regarded as a 'hard-intervention' strategy (Cava-Ferreruel & Alabau-Munoz 2006), which parallels policy approaches in South Korea, Norway and Singapore. However, the multi-technology mix (MTM) model of broadband deployment could be characterised as a medium-intervention broadband strategy.

On the infrastructure supply side, Cava-Ferreruel and Alabau-Munoz's empirical analysis of factors affecting broadband coverage found that the 'economic level of the country' was the leading factor, which was 'out of the scope (at least directly) of telecommunications policy' (2006, p. 456). Other factors which influenced the availability of broadband included: strong competition, low urbanisation levels in some areas, infrastructure sharing, and the level of modernisation (Cava-Ferreruel & Alabau-Munoz 2006).

On the demand side, socio-demographic factors including income, education, gender and age have previously been found to play a role (Savage 2001). However, Cava-Ferreruel and Alabau-Munoz demonstrated that other factors are also involved, including the availability of local content – which is echoed in analysis from John Stanton (2011), who is involved in the debate as Chief Executive Officer of a significant stakeholder (Communications Alliance). Stanton has raised the same argument in relation to digitisation of Australian resources. Cava-Ferreruel and Alabau-Munoz conclude that:

For public policies to promote broadband demand, empirical analysis results suggest that soft-intervention *strategies* to increase people's predisposition and skills for using new technologies and to promote relevant local content could be effective. (2006, p. 462)

Recently Australian analysts have highlighted the portrayal of “speed” in the public debate, both in terms of how the NBN will enable faster data transfer, and how quickly it is rolled out. They see a need for synchronicity in broadband speeds, and in adoption rates, in order to realise the benefits of the NBN, as:

...technical, social and political intricacies of Australia’s high-speed broadband project cannot easily be separated or over-simplified. While the NBN has consistently been framed through its speed of connection, we must analyse it in conjunction with its speed of perception, implementation and adoption (Dias et al. 2014, p. 125).

The Labor and Liberal parties’ broadband policies set the agenda for Australian government agencies delivering broadband. They set policy parameters within which the DoC, the regulator – the Australian Competition and Consumer Commission (ACCC) – and nbn work. Political parties issue policy updates, usually in the lead-up to elections, which can change the direction of all the agencies and stakeholders involved in delivering the NBN.

The current government issued nbn with an updated *Statement of Expectations* on 8 April 2014, which includes Liberal NBN policy priorities:

- NBN to be a wholesale-only access network, operating at the ‘lowest practical levels in the network stack’.
- Completion of the NBN will effect structural separation of Telstra.
- nbn should transition from FTTP to an optimised MTM model for the rollout. (Liberal Party 2014b, p. 1)

In addition, the current Liberal policy includes the following:

- Download speeds of between 25 and 100 megabits per second by the end of 2016 and 50 to 100 megabits per second by 2019.
- The rollout of the NBN under the Liberals will be complete by the end of 2019.
- Regions with substandard internet services will receive priority rollout. (Liberal Party 2014a)

### 3.3.1 Using evidence

There has been a shift in the policy literature to an emphasis on evidence-based policymaking (EBP) (Head 2013; Spencer 1987; Watts 2014). Government agencies across Australia embrace EBP, and it is commonly taught as doctrine in university public policy courses. The NSW Office of Finance and Services has established a Data, Evidence and Analysis Network (DEAN), which aims to raise awareness of the value of EBP across government.

This study accepts that EBP is current best practice, and that policy should be based on sound findings, ordinarily from the realm of the social, policy or political sciences. Drawing on theory in sociology, political science and policy writing, this study assumes that where a study makes a clear finding about the efficacy of a specific policy or program approach, that finding should be taken into account in making policy decisions. This study considers how the practice of IM affects the *extent to which* that finding is taken into account in policymaking.

Before accepting EBP as a preferred model of policymaking, it is necessary to consider critiques of the applicability, objectivity and value of empirical findings in the social sciences – as these are foundational to EBP. Spencer makes strident criticisms of social science studies and their applicability to policy (1987), and he is cited in recent EBP debates (Watts 2014). Spencer writes:

Social scientists – as concerns their actual practice of social science – do not know what they are doing and... their ignorance of this fact has serious consequences for the progress of their field. The basis of my argument is the assertion that a gap exists between the actual practice of social science as imperfect empiricism and putative practice of social science as scientific empiricism. (1987, p. 331)

Spencer argues that social scientists claim empirical findings and conclusions but shape the presentation of certain facts and perspectives to support their pre-formed conclusions. Notably, Spencer's arguments do not apply to this study's findings, as this study is not empiricist and does not make generalisable claims; instead it takes an inductive, interpretivist approach. Nonetheless, Spencer's claims about the place of the social sciences in society are relevant to weighing appeals to evidence in the NBN policy debate:

...the consequence of this failure to link social science persuasively to the realm of ordinary experience is the ill-repute of the social sciences in the public consciousness, marked by the failure of the social sciences to dominate public debate in those realms in which they claim expertise. (1987, p. 365)

If this failed link persists, it may partly explain why there are limited calls in the public debate for the evidence supporting proposed policies: for example, relative societal merits of FTTP versus FTTN. In Spencer's view, politicians are able to make claims about social sciences (and in turn, policy), because social scientists or policy experts do not control this territory in the public sphere:

Thus in matters concerning the budget, unemployment, trade policy, the role and structure of government... the "experts" of social science may join in the public debate, but they certainly do not dominate it. An American senator feels free to offer policy advice on how to control the drug problem, but he would never consider offering advice on how to go about creating a vaccine for a disease.

Social scientists have failed to dominate the arena of public debate in the domains of their putative expertise because of their inability to achieve "practice" and "pouvoir." Social science has – thus far – been unable to demonstrate its efficacy in ways that directly enter into the experience of the non-scientific community. They have not been able to produce the social scientific equivalents of nuclear explosions, antibiotics, vaccines, computers... (1987, p. 362)

Arguably the natural sciences and social sciences cannot be workably compared, because they operate on different aspects of the world. Furthermore, questions of social policy and resolving 'wicked problems' (Watts 2013, p. 113) may not lend themselves to empirical resolution.

Spencer's arguments have not been widely reiterated or applied across the social sciences (searches of all major journals returned insignificant results on 'imperfect empiricism'), and some of his observations reflect their time – more than a quarter of a century ago.

Interestingly, Spencer turns his critique onto his own journal article, and does not appear to counter it, concluding thus: 'the astute reader will have become aware of the fact...

that I have taken my own argument seriously by self-consciously presenting an argument that could be characterized as a work of deliberate persuasion' (1987, p. 370).

Other authors draw on Arendt (1968) to debate the role of EBP in policymaking and in Australian society, and this includes Alford (2008), Head (2008) and Watts (2014). Despite Spencer's criticism, and recent debates, EBP is arguably still a sound basis for assessing the efficacy of policy processes and outcomes in the public sphere.

### 3.4 The gap in knowledge

On the basis of the literature review, there is a lack of rigorous research into *how* IM practices are used and *how* they influence public debate and public policy. Existing research is largely confined to functionalist disciplinary and professional practice studies. That research informs this study, and is valuable and instructive to a scholarly understanding of IM; but it does not situate IM within its broader sociopolitical context, nor does it account for the wider implications for the functioning of a deliberative public sphere or the democratic polity.

More specifically, no qualitative examination of IM practices in Australia deals with a single case study of an infrastructure project at the same level of importance and impact on a nation as the NBN – which affects Australia's people, economy, society, and ultimately its future.

There is extensive literature exploring practitioner IM models and strategies (Galloway & Kawansah-Aidoo 2005; Harrison 2008; Jaques 2014; Palese & Crane 2002a), but it often prioritises a corporatist or managerial perspective. It seldom looks in-depth at interactions between IM, public affairs and policymaking, and the implications for understanding the public sphere and the functioning of a modern democracy.

The IM literature lacks insight into the potential of IM in government contexts, where policy and political considerations are often paramount. Much of the IM writing does not account for contemporary developments in the public sphere, and needs updating to reflect the role of social media and new communications and mobile technologies.

Many of the existing IM case studies and models have been of American or European origin, and do not directly relate to the Australian public sphere, so IM practices reflected

in those studies have not been assessed against their claims in an Australian context. This study, to some extent, addresses this gap in scholarship.

Although it is not this study's primary focus, a further gap in the literature is in practical, evaluated models of IM that Australian practitioners can readily apply in a public policy context. Jaques provided an outcomes oriented model for practitioners (2000), which he reproduced in his 2014 work, along with a more nuanced IM process model (**Appendix 6 – IM process flow**). However, it is questionable whether Jaques' 2014 model, or others which take a corporate perspective, such as those posited by Palese and Crane, will work equally well in an Australian government context. This study also contends that dominant policymaking models do not fully account for the role of IM in public affairs, effective media management, and the social media cycle.

This chapter has identified the primary IM theories, considering IM's positioning within corporate strategy, and its relationship with reputation management. It has also considered IM in public affairs, ending by identifying the gaps in existing knowledge – which this thesis goes on to address.

## 4. THEORETICAL FRAMEWORK

This chapter builds on the literature review by mapping out the broader context for the study and its theoretical framework. Central to this is the *public sphere* and the media's role within it, and the techniques used by those exerting influence in the public sphere.

The interrelated theories of agenda setting, priming and framing provide the analytical lenses for the study: they help explain how NBN-related issues are represented in the public sphere, and how these representations are orchestrated by issue managers. "Managing" of issues, in the context of this study, includes agenda setting, priming, framing and representation (including media representations).

Habermas provides a conceptualisation of the public sphere which helps identify the location of IM and signal its significance. However, criticisms of Habermas' notion of a deliberative public sphere, such as its normative focus and its 'idealization of public reason' (Curran 2002, p. 45), are also taken into account. Figure 8 (below) gives an overview of the theoretical framework and analytical lenses for this study.

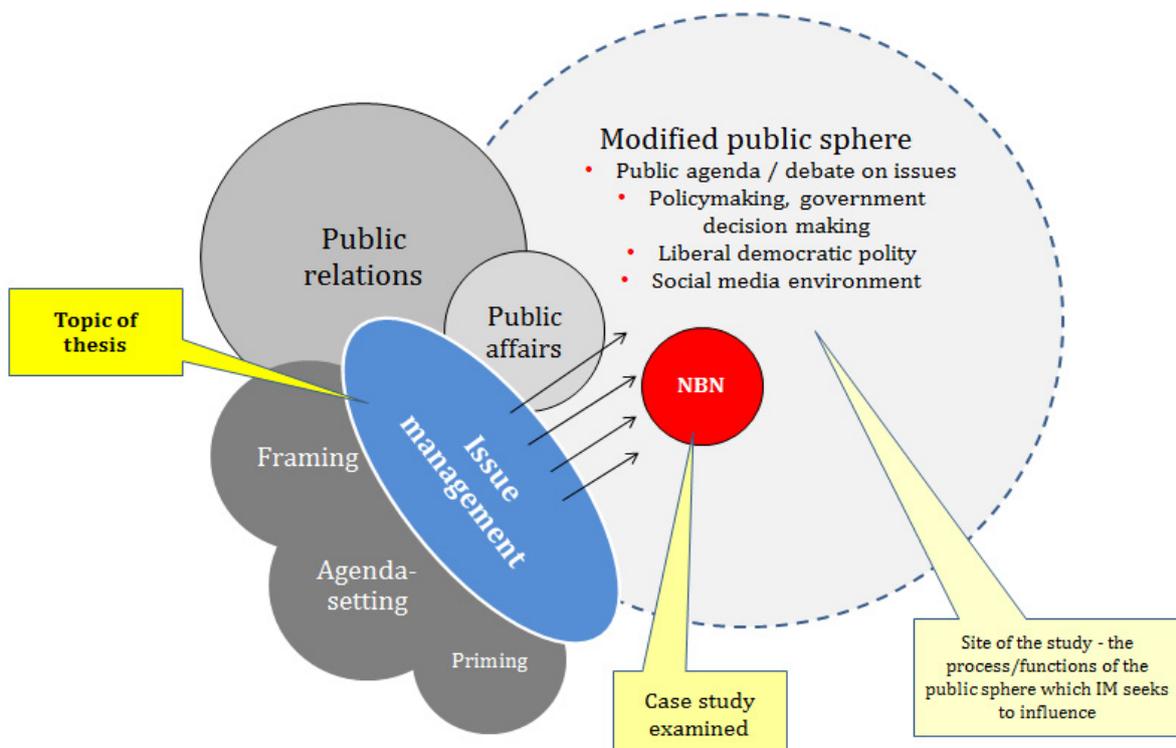


Figure 8. Theoretical framework

## 4.1 The public sphere

While drawing on Habermas' normative notion of the deliberative public sphere (1989), this study adopts elements of prominent critiques (Curran 2002, 2011; Dahlgren 2005; Roberts & Crossley 2004). It examines IM and its influence in a contemporary context – accounting for the role of the internet and social media.

Debate in the public sphere is not only located within the media and traditional press reporting of NBN public policy issues. Sites of debate and deliberation are dispersed, and themes and messages arguably move between these sites. Locations include social media, conferences, academia, journal articles, specialist publications and industry press (e.g. *CommsDay*), parliamentary debates, parliamentary committees, meetings among select stakeholders groups, and radio and TV current affairs shows such as *Q&A*.

Habermas (1989) proposed a conception of democracy within a bourgeois public sphere, in which the media has a central role in public debate and consensus building. Against this backdrop, the theories put forward by IM scholars represent a perversion of Habermas' bourgeois public sphere, as the deliberative process can be manipulated through effective IM practices. Habermas argues that:

...the public sphere can best be described as a network for communicating ideas and points of view, which filters and synthesizes diverse streams of communication... in such a way that they coalesce into bundles of topically specified *public opinions*. (1996, p. 360)

The concept of *opinion publique* is essential to Habermas' idealised public sphere:

...publicity was, according to its very idea, a principle of democracy not just because anyone could in principle announce, with equal opportunity, his personal inclinations, wishes and convictions – opinions; it could only be realized in the measure that these personal opinions could evolve through the rational-critical debate of a public into public opinion. (1989, p. 219)

As part of an organisation's communications function, IM is located *within the public sphere*; in the example of the NBN case study, this public sphere is bounded by democratic politics. Political actors play out the public debate, often using mass media, in order to influence public opinion, which in turn may influence policymaking in a

democratic polity. In this study, the public NBN debate primarily takes place in the mass media, which includes the technology and trade press.

IM is also exercised in non-democratic environments, where the public sphere differs greatly from the one considered in this study. Corporate interests and governments in developing countries use IM, for example in the Ogoni/Shell controversy in Nigeria involving oil wells (Boele, Fabig & Wheeler 2001), and the Chinese response to the Sichuan earthquake (Harris 2008). However, such environments are beyond the scope of this study.

In an insightful study on the Australian gun debate, Reynolds notes that 'studies of agenda setting and issue management have revealed in Australia and overseas how issues rise and fall on the public agenda as new developments occur and as the media give them attention' (1997, p. 345). Foster and Howell (2010) more recently reflect these linkages in their discussion of the influence of the mass media on Australian foreign aid funding.

Reynolds concludes that:

...public opinion itself can be used as a tool in business and politics to bring pressure to bear upon a target audience in the persuasion process... this process of using the media and public opinion to influence decision makers is evident from this study. (1997, p. 345)

Habermas acknowledges the manipulation of the public sphere in the transition to its 'social-welfare state', aptly describing how organisations:

...strive for political compromises with the state and with one another, as much as possible to the exclusion of the public; in this process, however, they have to procure plebiscitary agreement from a mediatized public by means of a display of staged or manipulated publicity. (1989, p. 232)

In Habermas' earlier works, the possibly democratising effect of the internet on public communication – through citizen journalism, the blogosphere and devolution of media controls – is not evident.

Habermas sees a struggle between 'a critical publicity and one that is merely staged for manipulative purposes' (1989, p. 235), and he presents a more nuanced conception of a

media 'system' in some of his works (2006, 2009). The "power of the media" is not treated as direct manipulation, but as a "struggle for influence" (Maia 2011, p. 148).

Habermas describes actors influencing the public sphere, including lobbyists 'who represent special interest groups' and advocates 'who either represent general interest groups or substitute for a lack of representation of marginalized groups that are unable to voice their interests effectively' (2006, p. 416). This study considered the role of lobbyists, consultants and advocates across Australia, as they employed IM practices to influence the media debate and the media "system" in the public sphere.

Maia, drawing on Habermas' later works, contends the media plays a crucial role in 'pre-structuring the public sphere' (p. 150). The ways in which it does this may be revealed by better understanding the influence of IM.

Habermas recognises that his concept of the public sphere is normative:

This generalized commitment to collective and rational self-determination was never fully realized. The bourgeois ideal of unhindered free speech was always some distance from reality, and this gap widened as the capitalist economy became more centralized and concentrated... the very concept of public opinion, according to Habermas, becomes transformed into public relations, the manipulation of mass consciousness through the culture industries. (Gardiner 2004, p. 28)

Other theorists critique the Habermasian public sphere, problematising notions of an idealised space for public deliberation (Dahlgren 2005; Mouffe 1999; Roberts & Crossley 2004). Some such criticisms bear on the usefulness of the Habermasian model for this study. It is alleged that Habermas overlooks some of the 'more coercive and power-driven attributes' of the public sphere, fails to account for the 'emancipatory potential of counterpublic spheres', and 'simplifies complex media practices' in the public sphere (Roberts & Crossley 2004, p. 11).

The Habermasian model is contradicted by other models of the public sphere, and of public debate within it. Mouffe posits an agonistic pluralism, critiquing the model of deliberative democracy, and instead favouring a model that allows for the expression of collective passions, transforming antagonism into agonism, and successfully 'domesticating hostility' (1999, p. 754).

Like Mouffe, Dahlgren critiques deliberation, arguing: 'adherence to the perspective of deliberative democracy risks downplaying relations of power that are built into communicative situations' (2005, p. 157). He notes further difficulties, 'I see limitations in the notion of deliberative democracy as an analytic horizon for understanding the democratic impact of political discussions in online public spheres' (2005, p. 155).

Roberts and Crossley criticise Habermas' notion of rational communication and deliberation. They propose that 'modern communication techniques are not simply a medium of thought and argument but also a potential source for power, domination and oppression' (2004, p. 11), which suggests that any rational consensus derived through communicative practices in the public sphere really results from an 'evolving process of coercion and exclusion' (p. 11).

Overlapping with powerful stakeholder theory (Grung & Repper 1992), political power theory helps explain the way actors in the public sphere exert power and influence. While viewing power as 'an essentially contested concept' (Lukes 1977, p. 9), Lukes posits multiple dimensions or layers of power (1986).

One view, expressed by Lukes, characterises power in terms of its use by actors to gain access to limited resources. Applied here, this means access to reselling broadband, or shaping the policy settings for the NBN, with potentially large sums of money at stake (e.g. Telstra selling its copper network). Another view is that the effective management of issues is linked to an organisation's ability to exert power over or to manipulate other actors in the debate.

Two layers of power, set out by Lukes, are relevant to this study. The first involves examining power in terms of decisions made, who is involved in making them, and the resources they employ to influence the process. This considers the actor's ability to modify others' behaviour in a decision-making process. The second layer entails the power to keep items *off the agenda*, limiting the scope of 'political process to public consideration of only those issues which are comparatively innocuous' to the party wielding power (Bachrach & Baratz 1962, p. 948).

Curran (2002) notes that Habermas' public sphere 'pays too little attention to low politics, clientelist power relations and debased journalism', and disagrees with Habermas'

'idealization of public reason' (p. 45). Curran disputes Habermas' 'portrayal of new electronic media as engines of indoctrination' as this 'has been refuted by two generations of audience research' (p. 45). Additionally, Curran critiques Habermas for ignoring or discounting 'the empowering consequences of the introduction of mass democracy, mass education, extensive state welfare, female liberation and the growth of prosperity' (p. 45).

The link between communication and power in Habermas is partly founded on Arendt's work. Habermas writes that 'the fundamental phenomenon of power is not the instrumentalization of *another's* will, but the formation of a *common* will in a communication directed to reaching agreement' (1977, p. 4). Following Arendt, Habermas further suggests 'power is built up in communicative action; it is a collective effort of speech in which reaching agreement is an end in itself for all those involved' (1977, p. 6).

Arendt's view is that the public sphere, or public-political realm, provides a source for the legitimation of power. To this extent, communications and debate in the public sphere must remain undistorted. Borrowing from Arendt to develop his public sphere model, Habermas argues:

...no political leadership can with impunity replace power through force; and it can gain power only from a nondeformed public realm. The public-political realm has also been conceived by others as a generator, if not of power then of the legitimation of power... the public-political realm can produce legitimate power only so long as structures of nondistorted communication find their expression in it.  
(1977, p. 9)

The public sphere model used in this study is influenced by Mouffe (1999) and Karppinen, Moe and Svensson (2008), who allow for a more nuanced democratic political theory and an in-depth understanding of communicative practices within the public sphere.

Wilson (2012) elaborates the public sphere model to encompass government involvement:

...at any one time there are many such dialogues taking place within overlapping circles of government and public institutions, departments and their client groups and critics, governments and their supporters and, sometimes more important,

their enemies, dialogues between all the circles and the wider world, dialogues with media commentators and critics, dialogues with parties in the public, dialogues even with academics. (2012, p. 20)

This underscores the importance of IM for government agencies, suggesting how an appreciation of the role of IM in the public sphere can enhance the work of government communicators.

Research indicates (and interview data confirmed) that IM is used widely in the government sector, and being increasingly adopted by agencies, statutory authorities, NGOs and publicly owned corporations: 'not to resist or modify public policy as originally conceived by the corporate founders of the discipline, but to promote and implement such policies' (Jaques 2012, p. 36).

However, there is arguably a feedback effect regarding policy. Where policies are successfully promoted to stakeholders they may be retained by a government or an agency, whereas a communications or IM failure could see them becoming unpopular with stakeholders – resulting in public pressure for them to be changed. In this case a government agency's communication efforts can influence an eventual policy outcome. For example, a government agency could use IM to manage adverse reporting on a public policy initiative they are involved with implementing.

According to Wilson (2012), not only are governments and issue managers within government able to influence the public sphere; the public sphere also influences government. The media's role is also highlighted in discussions of the public sphere in other jurisdictions, particularly the UK. Wilson notes that the media discussion can directly influence the way politicians respond, for example, 'government ministers may be as likely to respond to the suggestions of the media in taking a policy initiative as to a proposal from a backbencher or select committee' (p. 22).

Democratic theory forms part of the underlying theoretical framework for this study, incorporating insights from early theorists including Hume (1748), Bentham (1776), Locke (1821), and on utilitarianism and social utility, Rousseau (1762), Mill (1859) and Rawls (1996); alongside more contemporary discussions about the role of public communication in a deliberative liberal democracy.

The discussion also draws on Foucault's (1982) concept of discourse, providing frameworks for interpretation (1972), and as a form of power and construction of reality (1982). Foucault writes: 'whether it is a philosophy of universal mediation, discourse is really only an activity, of writing in the first case, of reading in the second and exchange in the third' (1982, p. 228).

Foucault's definition of discourse is fraught, even within his own writing. Mills notes that 'discourse is one of the most frequently used terms from Foucault's work and, at the same time, it is one of the most contradictory. Foucault himself defines it in a number of different ways' (2003, p. 54). This study employs the term as presented in Foucault's 1982 essay.

Seeking to reconcile Foucault's definitions of discourse, Mills writes that 'a discourse is a regulated set of statements which combine with others in predictable ways. Discourse is regulated by a set of rules which lead to the distribution and circulation of certain utterances and statements' (2003, p. 54). Issue managers may contribute to perpetuating dominant discourses around particular subjects, and excluding others, in an effort to help manage public affairs issues.

Foucault 'stresses that discourse is associated with relations of power' (Mills 2003, p. 54), raising questions about how IM can influence power relations within society, and potentially protect those in powerful positions in the public debate – with implications for the functioning of a democratic polity.

Foucault suggests 'discourse transmits and produces power, it reinforces it, but also undermines and exposes it, renders it fragile and makes it possible to thwart it' (1978, p. 101). The free press, playing a part in facilitating public deliberation, has an important role in a functioning democracy (Bessette 1980).

To achieve democratic outcomes requires quality deliberation: where rational, optimal policy choices are made because they win over superstition or irrationality in public debate (Fishkin & Luskin 2005). However, research informing this study suggests it is possible that the practices of issue managers, by influencing this public debate, could affect which policy alternatives garner popular support and prevail – independent of their objective merits.

Heath has outlined the role of activists in the public sphere:

A wide array of issues, resulting from robust and far-reaching protest, were raised against businesses in every industry... business operating options could be substantially challenged and constrained by the value preferences and growing publicity and clout of activists. Activists honed their skills and developed new value perspectives. They used these to constrain boardroom activities. Business activities and public policy initiatives collided. (2002, p. 209)

The use of IM by corporations to manage public policy issues, and to help devise a communications response to activist activities, is echoed in government use of IM. For Heath, 'activists were seeking new laws and regulations to force new standards of corporate responsibility on industry' (2002, p. 209); in relation to the NBN, they were lobbying for specific regulatory outcomes. In Heath's view, SIM 'was a process for being vigilant for threats and opportunities that can affect how the organization achieved its mission and vision' (2002, p. 33).

Palese and Crane (2002b) champion the value of IM for C-level leaders. The IMC continues to sell their products and promote the value of IM. By contrast, other writers consider whether the practice of IM has diminished; commentators including Jaques (2012) contend IM could well be in decline as a standalone discipline.

Commentary on the role of media in society continues to highlight the importance of IM, for example, in the non-academic work of Davies:

...the really big boom area of PR over the last couple of decades has been 'issue management', which has seen the mass media become the plaything of multinational corporations and opposing pressure groups. The result is a kind of information chaos. (2011, p. 185)

The literature indicates that IM remains vital for organisations in the predominant digital public sphere, where issues can develop and spread in changing ways, quickly resulting in viral 'issue contagions' (Coombs 2002, p. 216) that can damage an organisation. 'A vast array of competing voices, as well as issues, crises, and risks, are not only reported and discussed in cyberspace but are also created there' (Heath & Palenchar 2009, p. 230).

A 2010 survey by Sha found that 29 per cent of PR practitioners who responded spent ‘a great deal’ (2011, p. 191) of their time on IM, up from 23 per cent in 2000. This is likely to be higher in more specialised public affairs practice.

In an older study that focused on 223 US-based organisations with a ‘formalized government relations program’ (Lerbinger 2006, p. 13), organisations were asked to report on whether they engaged in 25 distinct public affairs functions. The most commonly reported functions were (p. 13):

Federal government relations (87%)

Business/trade association memberships (84%)

**Issue management (83%)**

State government relations (83%)

Grassroots/grasstops lobbying (81%)

Local government relations (79%)

Some practitioners may be undertaking IM without being aware it is commonly viewed as a discrete practice. Given the varying definitions of IM and the range in practitioner knowledge, statistics from studies such as Sha’s must be critically considered, as many practitioners may be doing more IM than surveys reflect.

By examining IM practices in response to NBN-related issues, this study takes a snapshot that could indicate IM practices in use more broadly across Australia. This study also builds on the findings of previous research on IM and agenda setting by Reynolds (1997), and to a lesser extent, Foster and Howell (2010).

Data gathering and analysis for this study considered whether public agencies involved in the NBN debate needed to employ IM to successfully deliver policies or services, to achieve positive overall social outcomes, and to be seen to have done so successfully in the eyes of their stakeholders. The modified Habermasian model is useful in understanding the positioning of an organisation in the public sphere, in its communicative function.

However, where issues are managed behind the scenes, the broader public sphere is less revealing of IM’s role. Interview data suggested that when some issues move onto the public agenda after having been kept off it, their effective management in an

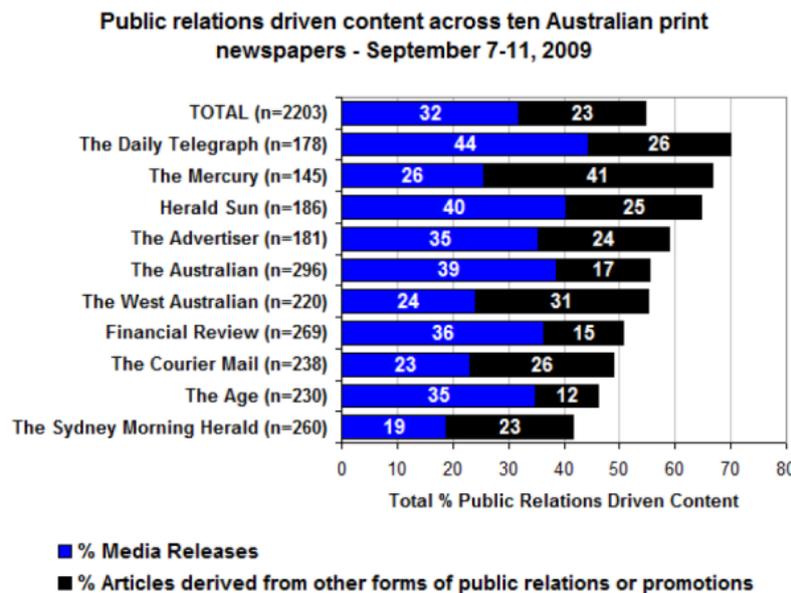
organisation's interests can be delayed (Hayvatt). Strategic management theory and practice will be considered to explicate the role of IM in these scenarios.

#### 4.1.1 PR influence on the media

It is well established in Australian and international literature that public affairs and PR advisers exert significant influence over the media. Crucially for the theoretical framework being applied to the immediate study, much of this media influence is exerted in the context of IM – even though it is not always recognised as such.

Studies suggest an increasing public affairs influence on the work of journalists, in an environment of cost-cutting, convergence and media consolidation. In 1992 Macnamara found 'very frequent' contact (86% of those surveyed) between journalists and PR practitioners. Macnamara's study found that of 768 stories, 31 per cent were 'wholly or partly based on... news releases', and in some cases 'up to 70% of the content of some small trade, specialist and suburban media was PR-sourced' (1992, p. 5). A 1994 Zawawi study found even higher figures reflecting PR influence, particularly in relation to business reporting, and these figures are reflected overseas in the UK (Davies 2011).

A 2010 Crikey, UTS and ACIJ study found that 55 per cent of 2203 media stories in 10 leading hard-copy Australian newspapers, over a five-day period, 'were driven by some form of public relations' (Bacon et al. 2010). Newspapers examined included *The Australian*, *The Australian Financial Review*, *The Advertiser*, *The Courier-Mail*, *The Daily Telegraph*, *Herald Sun*, *The Mercury*, *The Age*, *Sydney Morning Herald* and *The West Australian*. Details can be seen in Figure 9 (overleaf).



**Figure 9. PR Content in newspapers**  
*Source: Crikey et al. (2010, p. 5)*

The publications considered ranged in PR driven content between 42 per cent and 70 per cent of stories analysed, and ‘papers owned by News Ltd, which controls more than two-thirds of the Australian metropolitan print media market, were more PR driven than those owned by Fairfax Media’ (Bacon et al. 2010). Business and politics reporting was singled out:

The business and politics rounds had the lowest concentration of PR-driven journalism, with business coverage being 50% public relations driven and politics at 37%. The lower figures for politics may be because more public relations activity happens behind the scenes through journalists’ relationships with politicians and their advisers and for that reason is harder to identify. (p. 4)

Relevantly, considering the technology-oriented nature of much NBN reporting, the study found that ‘The highest levels of PR content... [were] found in the innovation/technology (77%)... round’ (p. 4), which suggests a particular media susceptibility to the effects of IM in these areas.

Recently Macnamara found that ‘despite reported perceptions and statements of journalists and editors that suggest non-co-operation and hostility, a substantial body of research shows extensive use of PR material by media, referred to as “information subsidies”’ (2014b, p. 740).

In the Macnamara study, senior PR practitioners acknowledged a 'significant level of interdependency' between journalism and PR; along with senior editors and journalists, they felt it was important that each field maintained a 'distinctly different role', and that 'a tension between them is necessary and a sign of health in the media ecosystem' (2014b, p. 743).

A similar effect has been found when governments use PR and communications to influence media, with agencies employing public affairs advisers and communications professionals to complement the work of policy line areas. Interview data indicated a growing emphasis on, or at least receptiveness to, the use of communications as a key practice in implementing policy.

Fynes-Clinton (2013) studied government communications, with reference to Kennamer (1994) and Simmons and Small (2012), finding that:

The preparation of media releases by government officers is an example of effort by policy makers to garner support... and to inform citizenry of their activities and decisions... Policy makers and organisations make an effort to shape the amount and kind of news coverage their media releases and other initiatives receive. (p. 3)

That observation was supported by this study's findings: interviewees working for government agencies noted the use of media releases and other IM practices to intervene in public debate (explored in more detail in Chapter 6 – Findings – IM practices). Fynes-Clinton's study found that '31% of the stories analysed in this study presented the government-crafted introduction as news, and the news outlet aired that angle' (2013, p. 8).

Significantly, this also means that 69 per cent of outlets did not 'toe the government line' (Fynes-Clinton 2013, p. 8) – and in many of these cases the media outlet viewed the news release as 'simply the inspiration for the story, not... as the story itself' (p. 8).

However, inspiring journalists may be sufficient in many cases for a PR practitioner who may be merely aiming to draw attention to a government initiative or a particular success. In these circumstances, any coverage on the topic may be regarded as a PR win so long as the reporting is neutral or positive.

## 4.2 Analytical lenses

The effects of IM on the public sphere are often understood in the literature through the analytical lenses of agenda setting, priming and framing – emphasising the media’s role in setting the parameters of public debate on high-profile issues.

The literature review has demonstrated an overlap between the three concepts: theorists blur some of the categories in relation to component elements of agenda setting, and elements it shares with framing (Macnamara 2014a).

McCombs and Shaw (1972) are often credited with establishing the agenda setting hypothesis (McCombs & Reynolds):

...the mass media set the agenda of issues for a political campaign by influencing the salience of issues among voters. Those issues emphasized in the news come to be regarded over time as important by members of the public... the media agenda can set the public agenda. (2002, p. 2)

In a US context, McCombs and Shaw found a correlation between what the public perceived to be the key issues in a 1968 presidential campaign, and the content of media reporting on the key issues (1972). Although McCombs did not prove a causal link, the correlation demonstrated was ‘in line with the conditions that must exist if agenda setting by the mass media does occur’ (p. 184). McCombs more recently summarises the ‘evolution of issue agendas’:

An ongoing stream of public opinion evolves in these civic arenas around the world that are defined by open political and mass media systems. Over time, the salience of individual issues rises and falls as the attention of the communication media and the public shifts. (2014, p. 80)

Media portrayals of public policy issues can influence policy outcomes (Barker 2005): for example, in the context of the issues-attention cycle (Nisbet & Lewenstein 2002). Prosser and McCombs write:

Media may influence significantly the agenda priorities as well as the views of the general public... in subtle and complex ways... impact may be greater or lesser, depending on the amount of media attention, the timing of the coverage, the

nature of the issues covered, and the medium itself... media agenda-setting... is now a demonstrated empirical reality. (1991, p. 149)

Agenda setting, priming and framing are viewed as interrelated (Scheufele & Tewksbury 2007), and IM practitioners may apply their effects in conjunction. These theories, along with frame building and agenda building, have been considered extensively in the context of political communication (Callaghan & Schnell 2001) and in relation to CSR (Wang 2007). See **Appendix 2 – Definitions summary** for definitions of key terms.

NBN policy is political: interviewees described the NBN as being treated like a “political football” (e.g. Dalby, formerly of iiNet). Priming and framing can influence how issues develop and progress, and how they are ultimately debated and resolved; these analytical lenses are particularly suited to advancing a qualitative understanding of how IM influences the policy debate.

Protest and McCombs suggest that ongoing ‘media coverage of government... [sets] the policymaking priorities of citizens and elected officials’ (1991, p. 150). They were writing with reference to the US experience, but arguably the Australian public sphere shares many common patterns in relation to agenda setting, priming and framing.

Findings from Hajer (2009) and Koch-Baumgarten and Voltmer (2010) support the view that media portrayals of issues in the public sphere can influence policy. However, issue managers can also employ agenda setting, priming and framing outside media channels to affect the way an issue is perceived among specific stakeholders. Similar techniques can be employed to set the agenda among focused policy stakeholder groups. A policy agenda or issues agenda can be influenced, and issues can be primed and framed among policymakers.

Although agenda setting, priming and framing are often discussed in the context of media influence, this study also applies these lenses to understanding the use of IM techniques by public affairs advisers and consultants, who in many cases work behind the scenes, aiming to keep issues out of the media. Many agenda setting, priming and framing effects can be more directly exerted through lobbying or face-to-face meetings; so this study is not dominated by a media-centric approach.

Related to agenda setting, the 'issues-attention cycle' (Downs 1991; Nisbet & Lewenstein 2002) is applied, to further explain the effects of IM on public debate. The issues-attention cycle model has faced criticism for lacking a recognition of the media's effects, although 'Downs acknowledges that the media operate somewhere in between these two [the public and public policy makers] and real-world phenomena' (Soroka 1999, p. 766). Soroka writes that a truer test of the application of the issues-attention cycle could be achieved through qualitative analysis and discussion (1999).

The media's influence on policymaking is documented: Barker (2005), Hajer (2009), and Koch-Baumgarten and Voltmer (2010). Rogers and Dearing (1988) refer to *policy agenda setting* as a specific type of agenda setting, 'in which elite policy makers' agendas are influenced' (Macnamara 2014, p. 136). Importantly for this study, agenda setting 'both informs policy analysis and political communication theory, and provides a link through which these fields can be connected' (Soroka 1999, p. 772).

The media's ability to set the public agenda, and therefore influence the policy agenda, puts the media in a powerful position in a democracy. McCombs writes, in the context of considering multiple studies, 'The evidence reviewed here, plus many other field studies conducted around the world, corroborate a cause-and-effect relationship between the media agenda and the public agenda' (2014, p. 15).

Some US commentators view the media as reaching the level of a 'shadow government' (Rivers 1991, p. 156). Drawing on a tradition of Western political thought – which is now problematised as excluding numerous voices – the US media is tasked with the responsibility of 'protecting the US Constitution' (Rivers 1991, p. 156).

Australia does not have the same constitutional emphasis on the role of the media, but drawing on a similar tradition, Australians do presume the importance of media independence. An issue manager who works closely through the media may be able to manipulate the public agenda, and secure a powerful position to affect public and/or organisational policy.

Priming has a role in shaping the way the media sets the standards by which people evaluate issues on the public agenda. However, theorists have disputed its relationship with agenda setting and framing. McCombs describes priming as 'a significant extension

of agenda-setting' (2014, p. 101), referencing Comstock and Scharrer's view that 'priming and framing are subspecies of agenda-setting effects that influence public evaluation and interpretation beyond the imputation of importance' (1999, p. 209).

Macnamara writes that priming:

Occurs when news content suggests to news audiences that they ought to use specific issues or attributes as benchmarks for evaluating the performance of leaders or organizations or forming an opinion about an issue... priming precedes agenda setting... priming suggests the criteria and standards by which issues should be judged. (2014a, p. 137)

This study uses Macnamara's (2014a) description of priming when applying it as an analytical lens.

Framing is a technique commonly applied by practitioners who may be able to influence what is kept in the frame and what is omitted when the issue appears in the public debate (Bateson 1955; Goffman 1974). Practitioners may frame an issue via the media (Fortunato 2000; Howell 2003), which then determines the agenda, reflects the practitioner's frame (or potentially reframes the issue), and performs a gatekeeper role (Birkland 1997).

In a public policy context, Druckman offers the following definition: 'a framing effect is said to occur when, in the describing of an issue or event, a speaker's emphasis on the subset of potentially relevant considerations causes individuals to focus on these considerations when constructing their opinions' (2001, p. 1042).

Agenda setting and framing differ in their application in this study in that 'while agenda-setting looks at story selection as determinants of public perceptions of issue importance, framing looks at the way those issues are presented' (Soroka et al. 2013, p. 206).

Kitzinger (2007) writes that 'journalists are consummate 'framers' of reality... as are professional PR workers who help control and shape the supply of information to the media' (p. 137). Hallahan describes framing:

...as a property of a message, a *frame* limits or defines the message's meaning by shaping the inferences that individuals make about the message. Frames reflect judgments made by message creators or *framers*. (1999, p. 307, italics in original)

He continues, describing three types of framing:

1. valence – presenting information in a positive or negative light
2. semantic – using alternative phrasing, or
3. story – involving selection of themes and narrative techniques (1999).

Hallahan's approach provides a useful way of understanding types of framing in the NBN debate, and research indicates that all three types are variously used. On framing Entman notes:

...to frame is to select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation for the item described. (1993, p. 52)

In reviewing definitional discussions of agenda setting, priming and framing, Macnamara (2014a) distinguishes two types of frames in media communication, drawing on Gitlin (1980) and Entman (1993). He refers to *audience frames* as 'mentally stored clusters of ideas that guide an individual's processing of information' (Entman 1993, p. 53). *Media frames* are 'persistent patterns of cognition, interpretation and presentation, of selection, emphasis and exclusion by which symbol handlers routinely organize discourse' (Gitlin 1980, p. 7).

This study shows some qualitative association between the two types of frame (Macnamara 2014a): media frames are represented in selected reporting on the NBN, or put forward by issue managers in backgrounding journalists. They also reflect the preferred way in which the issue manager wants the audience to consider the issue in question. This study's default focus is on the use of media frames.

NBN language around technology reflects similar tendencies. The existing network is variously described as the "ageing copper wire", "copper network", or "existing

infrastructure”; the first description evokes notions of imminent obsolescence in the minds of audiences.

This chapter has outlined a modified Habermassian model of a public sphere, and considered critiques of rational debate and public deliberation – with organisations exerting power over of the course of the discussion, and potentially over other actors. In considering PR’s influence on the media, this chapter also discussed how organisations can use PR and IM to contribute to and influence public deliberation and policy.

This chapter also presented the analytical lenses used throughout this study – agenda setting, priming and framing – and demonstrated that there are multiple definitions of each. See **Appendix 2 – Definitions summary** for definitions as applied in the study, and also **Appendix 10 – Agenda setting, priming and framing**, for a more in-depth discussion of the influence of agenda setting, priming and framing.

## 5. RESEARCH APPROACH, METHODOLOGY AND METHODS

This chapter explains the approach taken in this study; it begins by outlining the RQs, and explains how the following chapters answer them. In particular, this chapter describes the NBN case study and, noting its issue-richness, describes why it has been chosen.

### 5.1 Research questions

To explore the gap identified in the literature, this study investigated the following research questions:

- RQ1. What practices are employed to “manage” public policy “issues”?
- RQ2. How are these practices used to influence debate in the public sphere?
- RQ3. How are these practices used to influence public policy?
- RQ4. What are the implications of IM in this context for organisations, the public sphere, societal interests and Australian democracy?

Beyond addressing the RQs, this study examined how close IM practices come to achieving their promise of affording practitioners influence over public policy processes and outcomes, as described by Palese and Crane (2002b), Heath and Palenchar (2009), and Jaques (2014).

For RQs two and three, the primary emphasis in the interview data was on influence *from an organisational perspective*. As multiple stakeholders were engaged on each issue, the overall direction the issue took on the public agenda was less important than how participants sought to influence it and how effective they perceived these practices to be. The first three RQs address the application of IM practices, while RQ4 draws out the broader implications for democratic society.

In drawing conclusions, this study assesses the level of evidence available on the basis of the interview data, artefacts provided to the researcher, and secondary materials. The study looks at the evidence of IM practices being employed, investigates how these are used, and assesses the evidence of influence on public debate and on policy.

At all times, this study contextualises the practice of IM, and the application of models outlined in the theory, in terms of the broader impacts and societal implications of these practices. The context is essential to understanding the operation and effects of IM practices – which interviewees themselves reflected. IM practice cannot be separated from its context, and to leave out either the practitioner elements or the broader societal elements would arguably render an IM study incomplete.

The literature review revealed potential divergence between academic study of IM and more practitioner-oriented study or applied research. Academicians could accuse practitioners of losing sight of the social context and implications of their practice, or its inherent constructedness, while practitioners could accuse academicians of not fully accounting for the realities of practice.

The qualitative data collected and analysed for this study explores the broader social implications of IM as well as informing practice. Consequently, this study could help to remedy the disjuncture between traditional scholarly examination of IM and practitioner-oriented work (Jaques 2008), bringing the two elements together within the broader context of implications for the deliberative, modified public sphere.

The RQs were designed to elicit uniqueness in the NBN case, by comparison with other IM case studies (especially those referenced at **Appendix 1 – IM case study comparisons**). Employing Stake's guidance, the study was often reflective, "Place your best intellect into the thick of what is going on." The brainwork ostensibly is observational, but more critically it is *reflective*... the researcher is committed to pondering the impressions, deliberating on recollections and records' (2008, p. 450, italics in original).

## 5.2 Approach

The RQs seek to understand *how* IM is practised, *how* it influences public debate and policy, and to explore the implications for the organisations involved, the industry sector, and the public sphere – including societal interests and the functioning of democracy. Therefore, this research adopted an interpretivist approach (Denzin & Lincoln 2008; Morrow 2007) – which is sometimes referred to as, or overlaps with, a constructionist or naturalistic approach (Lincoln & Guba 1986) – using the NBN as a case study. The study examines 'things in their natural settings, attempting to make sense of, or interpret, phenomena in terms of the meanings people bring to them' (Denzin & Lincoln 2005, p. 3).

Taking an interpretivist approach rather than a positivist or post-positivist scientific approach enables a deeper understanding of how and why IM practices were employed, and their implications. IM is regarded as a phenomenon that is largely socially constructed by humans, and so suited to *interpretation* by humans – ideally in a naturalistic setting rather than an artificial laboratory or traditional scientific setting. This approach acknowledges the potential for multiple participant meanings, and the social and historical construction of IM (Creswell 2009).

Subjectivity is a strength for a study of IM and its implications: any subjectivity has been shaped by the researcher's direct experience in IM and policy fields, which helps to interpret and understand the data gathered from practitioners. Trustworthiness is supported through establishing credibility, transferability, dependability and confirmability (Lietz & Zayas 2010; Shenton 2004), drawing on multiple sources, and through techniques such as corroboration and triangulation (Stake 2008).

The techniques outlined in this section also helped the researcher avoid 'anecdotalism' (Silverman 2013, p. 286) in interpreting the interview data. Although Silverman comes from an ethnographic perspective, he considers challenges that are common to many qualitative researchers, and his guidance is applicable to this study.

Silverman describes the problem of anecdotalism and the need to ensure that findings are 'genuinely based on critical investigation of all... [the] data and do not depend on a few well-chosen examples' (2013, p. 286). Silverman argues that 'methodological awareness' (p. 286) can help guard against anecdotalism, and he suggests solutions including 'respondent validation' (p. 288). Due to standard doctoral time and resource constraints, respondent validation across interviewees was not possible in this study. However, some limited checking of quotes was undertaken, discussed in more detail in Section 5.7 – Trustworthiness.

As Silverman notes, 'doing 'qualitative research' should offer no protection from the rigorous, critical standards that should be applied to any enterprise concerned to sort 'fact' from 'fancy'' (2013, p. 15). This study applies critical reflexivity in its data analysis and discussion (Drisko 1997; Horsburgh 2003), which helps address positivist critiques of interpretivist approaches which often point to a perceived need for scientific "objectivity" (Berger & Luckmann 1966).

This study draws on aspects of the techniques set out by Silverman – ‘refutability principle, constant comparative method, comprehensive data treatment, deviant case analysis and using appropriate tabulations’ (2013, p. 289) – to strengthen the trustworthiness of the results.

Of the nine interpretive frameworks Creswell (2013) outlines for qualitative research design, this study variously applies aspects of ‘social constructivism’, ‘transformative frameworks’, ‘postmodern perspectives’, ‘pragmatism’ and ‘critical theory’ to data analysis and discussion (pp. 24–31). The constructivist elements stem from a sense that ‘all knowledge is co-constructed’ and so the research design prioritises ‘depth over methodological structure’ (Lietz & Zayas 2010, p. 189).

Creswell notes an overlap between social constructivism and interpretivism, referencing Mertens (2010) and Denzin and Lincoln (2011); many researchers use the terms interchangeably. For Creswell, the goal of social constructivist research ‘is to rely as much as possible on the participants’ views of the situation’ (2013, p. 25). He notes the merits of a social constructivist approach:

Often these subjective meanings are negotiated socially and historically. In other words, they are not simply imprinted on individuals but are formed through interaction with others (hence social construction) and through historical and cultural norms that operate in individuals’ lives. Rather than starting with a theory (as in postpositivism), inquirers generate or inductively develop a theory or pattern of meaning. (2013, p. 25)

In-depth interviews helped tease out the perspectives of the policy actors involved (Holcomb 2005), and gave an insight into how they used IM practices, how they perceived the impact of these practices, and what those impacts meant in relation to their own strategic objectives.

The emphasis on the participants’ individual perspectives elucidates how they use IM practices, in a way that taking a positivist or post-positivist approach would not permit. The study’s naturalistic approach also included humanistic and informal aspects, focusing on social impacts of IM (particularly in Chapter 8 – Discussion).

Texts examined for this study were analysed to understand the ‘perspectives of the producers of the text...’ paying ‘attention to unique themes that illustrate the range of... meanings of the phenomenon [of IM] rather than the statistical significance of the occurrence of particular texts or concepts’ (Zhang & Wildemuth 2009, p. 2).

### 5.3 Methodology

The qualitative methodology adopted here allows the broader contextual meaning of interviewee accounts to be explored, along with the practices they undertake to manage NBN policy issues. The complexity of the case study – multiple NBN issues potentially interacting in a fast-developing public sphere, with numerous stakeholders and a web of vested interests – lent itself to the nuanced understanding attainable through a qualitative methodology.

Zhang and Wildemuth note that ‘qualitative research is fundamentally interpretive, and interpretation represents... personal and theoretical understanding of the phenomenon under study’ (2009, p. 5). Lietz and Zayas (2010), who draw on Morrow (2007) and Denzin and Lincoln (2008), echo sentiments expressed by Zhang and Wildemuth:

Qualitative research tends to be interpretivist and seeks to understand a phenomenon in its context in greater depth... It seeks to elucidate the nature of social practices, relationships and beliefs along with the meaning of human experiences from the participants’ point of view. (p. 190)

Macnamara’s work (2005, 2012a) has highlighted the benefits and challenges of quantitative versus qualitative approaches. Quantitative studies can rigidly produce numbers without furthering understanding or depth; in this regard they can be broad and shallow. Their strengths lie in statistical reliability and generalisability. However, qualitative studies, in their subjectivity, can facilitate greater human empathy and understanding of the subject being examined.

This study has benefited from taking a narrow, deep approach to the case study and RQs, as is evident in the richness of the interview data – the main dataset for the study and source for textual analysis. Conversely, the strengths of quantitative studies – including their scientific reliability and potential for objectivity, must be acknowledged.

Although the methodology was *primarily qualitative*, there was a quantitative component that lay in determining which issues to track through media content analysis, based on measuring frequency of issue reporting. Coding necessarily involved a quantitative component: tallying numbers of codes at specific nodes, and then discussing these in a comparative context. The process of coding itself, however, remained qualitative.

Finally, it can be argued that qualitative studies such as this one are better designed to account for ontological, epistemological and axiological assumptions – enriching the study and enhancing the potential for insight. By comparison, a quantitative study of IM in the public sphere could fail to properly account for these elements, thereby affecting the overall usefulness of the study.

### 5.3.1 Case study

This investigation utilised a case study as the site of in-depth qualitative research, as case studies represent one of five qualitative inquiry traditions in Creswell's analysis (2013).

This study also drew on Stake (2008) and Yin (2014) to provide a framework for case design. Yin provides a twofold definition of a case study, which guided the design of this research:

1. A case study is an empirical inquiry that:
  - investigates a contemporary phenomenon (the “case”) in depth and within its real-world context
  - when the boundaries between phenomenon and context may not be clearly evident.
2. A case study inquiry:
  - copes with the technically distinctive situation in which there will be many more variables of interest than data points
  - relies on multiple sources of evidence, with data needing to converge in a triangulating fashion
  - benefits from the prior development of theoretical propositions to guide data collection and analysis. (2014, p. 17)

The theorists cited in this section disagree over whether a “case study” is a “methodology” in its own right. This study adopts Creswell's definition of a case study: ‘...a type of design in qualitative research... in which the investigator explores a real-life,

contemporary bounded system (a case) or multiple bounded systems (cases) over time, through detailed, in-depth data collection involving multiple sources of information’ (2013, p. 97).

The RQs are aimed at developing an *understanding* of how IM practices are used to influence policy and public debate, lending themselves in their phrasing and focus to a case study design. There are many ways to study IM, and different approaches could have been used (see the discussion in **Appendix 11 – Establishing trustworthiness**).

Using this case study allowed a deep naturalistic study of IM practices at work, drawing on ‘multiple sources, such as interviews, observations, documents and artefacts’ (Creswell 2013, p. 105). As Yin notes, ‘you would want to do case study research because you want to understand a real-world case and assume that such an understanding is likely to involve important contextual conditions pertinent to your case’ (2014, p. 16).

Qualitative case study methodology is thoroughly researched and well regarded; it is accepted in public affairs, policy, social science, political science and communications research, having a ‘long, distinguished history across many disciplines’ (Creswell 2013, p. 97).

In addition, the researcher was well positioned and equipped to conduct an in-depth case study, given his background and research skills, which is relevant in this type of qualitative research (Alkin, Daillak & White 1979; Patton 1990; Shenton 2004).

The researcher practised law in two Australian jurisdictions, and has worked in public policy, public affairs and IM in public and private sector environments for the last nine years; this background is of benefit in this study given the inductive approach taken, and considering the interpretivist, social constructivist perspective adopted.

A case study held the potential to analyse the data at singular or multiple units of analysis, and to draw comparisons and contrasts. There could be one case, the NBN – a ‘within-site study’ – or multiple individual cases across the six issues tracked – a ‘multisite study’ with sub-cases (Creswell 2013, p. 97). This study examines the NBN from both perspectives, descending to greater depth where this is necessary to address the RQs or follow the course of sub-issues.

Applying Stake (2008) and Yin (2014), this study adopted a single case to allow in-depth examination of issues related to a singular policy/project initiative, and to provide a focus for the study and data gathering efforts. It was a means of simplifying and centralising the research design.

The single case drew together disparate policy threads in the public sphere for easier analysis, thereby supporting the feasibility of the study, and its potential for completion within a reasonable timeframe. Using one case study involving many related issues offered the opportunity to examine the interplay of issues – in this case, all relating to one larger infrastructure initiative.

Stake (2008) posits five requirements for a successful case study: issues choice, triangulation, experiential knowledge, contexts and activities. Stake endorses a comparative approach: ‘we cannot understand a given case without knowing about other cases’ (p. 444), and so in this study there is comparison between the management of issues (across sub-cases within the NBN case), between the NBN and other instructive IM case studies (set out in **Appendix 1 – IM case study comparisons**), and briefly with overseas broadband policy frameworks with similar objectives.

This was an ‘instrumental case study’, as the investigation aimed to ‘provide insight into an issue’ and to draw limited non-statistical generalisations as far as these were supported (Stake 2008, p. 445). Stouffer (1941) notes the following aspects of qualitative case study research:

- nature of the case – activity and functioning
- its historical background
- its physical setting
- broader contexts: economic, political, legal, aesthetic
- other cases through which the case is recognised, and
- informants through whom the case could be known.

Context is crucial in the NBN case study – including the economic, political, legal and stakeholder environment, and the way elements of this environment overlap to bring pressure to bear on policymakers and actors in the public debate.

Stake's discussion of research design (2008) emphasises the role of human experience in qualitative case study analysis. Vicarious experience contributed to this study, through the input of interviewees as well as that of the researcher in IM. This was reflected in the researcher's presence in the study, and role as the 'primary instrument of data collection and analysis... all information... is filtered through the researcher's eyes and ears and is influenced by his or her experience, knowledge, skill and background' (Lichtman 2013, p. 21).

### 5.3.2 The NBN

There are projects comparable to the NBN in Australia and overseas from which to select public policy issues for analysis, but the NBN's scale, importance, and complexity meant NBN issues provided a unique sample source.

NBN issues frequently appeared on the public policy agenda over recent years (see **Appendix 12 – Issue salience data** for the time periods used), and were widely reported beyond the specialist technology press. The ways the selected NBN issues affected each other, and the additional challenges this posed for issue managers, further added to the NBN's suitability as a case study.

The NBN is the largest and most expensive infrastructure project in this country's history, projected to cost \$29.5 billion (Liberal Party 2014c). It will arguably have far reaching social, cultural and economic consequences for Australia's future – which helps to ensure the currency and relevance of the study – and has generated abundant secondary research material, much of which is publicly available.

At the time of writing there is no other known comparative IM-related scholarship on the NBN. The NBN is likely to remain a significant policy issue on the Australian public policy agenda, due to its scale, impact on Australian society and the politics surrounding it. As such, it continues to provide a superb site for dissecting the interactions of IM and policymaking by comparison with other large policy initiatives. It offers issue complexity, and data has demonstrated issues interaction – adding an additional layer for analysis.

The researcher's background helped secure access to potential interviewees, by comparison with alternative case study topic choices. Selecting the NBN for this study

supports its feasibility, as the researcher has public sector experience in ICT policy and IM in Australia at the state and federal levels.

## 5.4 Methods

The methods used for this study were primarily qualitative: coding of interview data was at the centre of the study. Methods included:

1. **Quantitative media analysis** of a selection of articles reporting on the NBN from concentrated sources (major print media coverage, archived through Factiva, over a range of time periods), to identify scope and confirm the salience of the primary NBN issues selected.
2. **In-depth semi-structured interviews** with IM professionals (who were most often in public affairs executive or related roles), asking about the practices they used to “manage” public issues, and when they used them and how they used them (qualitative).
  - Querying whether these practices influenced the public debate surrounding the issue (as identified in the work of IM theorists including Heath and Palenchar (2009)).
  - Querying whether these practices influenced policy development, implementation or outcomes.
  - Extensive initial structured content analysis (coding) of the interview transcripts using NVivo and Microsoft Excel to develop a deeper understanding of meaning with reference to the RQs.
3. **Qualitative textual analysis** of media coverage, reports, speeches, submissions, artefacts from interviewees and other secondary materials for the NBN issues being tracked.
  - This built on (2), starting with the practices used, and seeking to understand how they were used and how they impacted media coverage and the public debate at the time.
  - Broader qualitative analysis contextualising the policy and regulatory response.

### 5.4.1 In-depth interviews

Interview questions were determined by the nature of the NBN issue involved, indications of IM activities gained from broader research (e.g. reports released, statements made) and previous responses of participants during the interview. **Appendix 13 – Baseline interview questions** sets out the starting questions used across all interviews; however, these were used as a reference point, and not read out verbatim.

The questions evolved during the course of the study. They were modified due to time constraints and interviewee experience/exposure to issues, as some participant organisations only had exposure to one or two issues. In such a situation there would have been no value in going through all sets of questions for all six issues.

The interviews typically commenced with a very brief introduction to the study and its focus on IM. This mirrored a standard UTS Information Sheet provided to each participant, and approved by the Human Research Ethics Committee (HREC).

Some interviewees saw IM as “stakeholder management”, PR, or media management. Where it was anticipated that an interviewee had no any understanding of IM, or was in a role that involved describing it as something other than IM, a brief explanation of IM in the context of the study was also provided, with care being taken to avoid the risk of influencing interviewee perspective or approach while contextualising the interview. Guidance on interviewing was drawn from Stake (2008), Creswell (2013), Seidman (2013) and Yin (2014).

Questioning was open-ended, giving interviewees time to talk – rather than strictly adhering to the baseline interview questions, or cutting people off. This was because allowing interviewees to talk freely resulted in richer data. Scholarship on qualitative case study methodology supports this open approach to questioning, as Creswell notes: ‘The more open-ended the questioning, the better, as the researcher listens carefully to what people say or do in their life setting. Thus, constructivist researchers often address the “processes” of interaction among individuals’ (2013, p. 25).

Where interviewees were evasive, one tactic used was to return to the topic later during the interview, and probe further. Leading questions were avoided, but they were used to

clarify or paraphrase, where the interviewee appeared to say something significant which needed to be confirmed.

Although the findings of this study are written in terms of “evidence” of specific practices, it is acknowledged that interviewees were not “under oath” in a legal sense, so reasonable scepticism was maintained in analysing, considering and drawing conclusions from the interview data. The impression gathered from the manner in which interviewees responded was one of frankness and general openness in response to questions.

The complexity, subtlety and nuance in IM were best addressed through face-to-face discussion in a personal setting. The information sought was unlikely to be divulged through anonymous surveys or similar means; most was not published anywhere, nor was it on the public record. Obtaining this information necessitated a level of direct contact. Most interviews were conducted in person, but where this was not possible for participants, interviews were done via Skype, or by telephone (which was the least preferred option).

An interview approach enabled narrow as well as broad inquiry. Given the timeframes and resource implications, along with the sheer volume of issues and related potential IM metrics to measure, interviews provided a relatively straightforward data source for this case study.

Data collected took the form of digital sound recordings which were transcribed using a transcription service to ensure a reliable information source, and to facilitate faster coding and analysis. Most interviews were transcribed by a single professional transcriber, which assisted with data consistency.

Interviews varied in length from one to five hours in total; longer interviews were split over multiple sittings in fairness to the interviewees. The longest interview was four hours and 45 minutes over three sittings. The total combined length of interviews was 39.5 hours. Bottled water was provided for interviewees where it was anticipated that the interview would take longer than 1.5 hours.

To ensure data consistency and a baseline level of accuracy, the researcher reviewed and edited transcripts, correcting errors. Initial audio was of variable quality, because for some interviewees it was not possible to establish ideal interview conditions and to

eliminate all background noise. In almost all cases interviews were recorded by at least two recording devices, allowing for the selection of the best quality recording for transcription.

Detailed conversation analysis techniques were not required to interpret the interviews, so “umms” and stammers et cetera were not normally transcribed (Zhang & Wildemuth 2009). Where there were specific or unusual characteristics in the audio these were noted in the transcripts.

For organisations that were important to the completeness of the dataset and involved multiple interviewees, the approach was to speak to less senior officers first, to get the background on the organisation’s approach to the six issues tracked, and then to move on to the senior executives. This minimised the impact on the time of senior executives at those organisations (such as federal politicians), as the questions had already been narrowed down. This approach dovetailed with growing data redundancy, so not all of the baseline interview questions had to be asked as interviews progressed and common IM approaches were repeated.

#### **5.4.2 Textual analysis**

Qualitative textual analysis was used in support of the interview approach. Writers including Frey, Botan and Kreps (2000) and Berger (2000) have advocated textual analysis as a component of qualitative study. The textual analysis also considered semantic and thematic elements of sources, and how these are culturally shaped.

Textual analysis suffers limitations – for example, it does ‘not integrate the context of production or audience reactions’ (Fursich 2009, p.238), and did not identify audience effects, although some of these may be deduced from the broader context. Fursich goes on to argue for the value of textual analysis in the context of media studies: ‘media texts present a distinctive discursive moment between encoding and decoding that justifies special scholarly engagement’ (2009, p. 238).

Fursich (2009) notes the unique potential of independent textual analysis to ‘elucidate the narrative structure, symbolic arrangements and ideological potential of media content... not only written material but every cultural practice or product can be analyzed

as a text' (pp. 239–241). In this study IM was also viewed as a cultural practice, with ties into public debate.

Hsieh and Shannon (2005) define qualitative content analysis as 'a research method for the subjective interpretation of the content of text data through the systematic classification process of coding and identifying themes or patterns' (p. 1278).

Secondary materials that were analysed to contextualise the issues being tracked included communication strategies, policy documents, issues briefs, ministerial submissions, political party platforms, Hansard transcripts, IM strategies, media releases, media backgrounders, and research reports.

Textual analysis was used to examine underlying ideological assumptions and, importantly, to provide an opportunity to view the text in its broader political context (Fursich 2009). However, Philo (2007) warns of staying too close to the text while undertaking textual analysis, and the dangers of this impairing considerations of the broader context.

Fursich contends that a combined approach yields the most beneficial results: 'meticulous reading and contextualized interpretation of text will be able to explain the specific ideological moment' (2009, p. 248). Because Fursich notes the possibility of combining textual studies with limited audience analysis, the audiences for IM interventions were also contemplated.

Textual analysis examined the broader role of PR and communications in shaping notions of public discourse in NBN debates, and normalising dominant interpretations of events (Fursich 2009) – which was sometimes achieved through attribute salience (McCombs 2014) and framing.

Commentators debate the extent to which media content analysis can be qualitative, and contend that this approach may only be quantitative (Neuendorf 2002). Others disagree, including Shoemaker and Reese (1996). This study's research design proceeds from the view that for these purposes, media content analysis can be qualitative.

Where necessary, there was analysis of messages, tone and overall polarity of media articles with respect to specific NBN issues on an ad hoc basis. This was to contextualise,

cross-check and support interviewee claims about the way specific issues were reported in the media.

This study includes extensive use of direct quotations and references to interview data to allow the “actors” involved in IM and close observers of the case study to speak in their own words. This added to the trustworthiness of qualitative data and helped uncover ‘patterns, themes, and categories important to a social reality’ (Zhang & Wildemuth 2009, p. 5).

As identified in the literature review, social media is increasingly a site of debate, and consequently, the focus of IM practice (Jaques 2014). Facebook posts and recorded tweets using NBN-related hashtags were also examined to capture social media discussion, and to inform issue and interviewee selection. Hashtags were selected depending on the frequency of their association with NBN issues. They included:

*#NBN*

*#NBNC0*

*#nbndebate*

*#nationbuilding*

*#fraudband*

*#auspol*

*#broadband*

Most analytics services did not provide historical analysis over the relevant time periods. A decision was taken not to utilise paid hashtracking services as they would not substantially assist in confirming issue salience in the public debate. Even where services were able to uncover large numbers of tweets, most could not verify that this was an accurate reflection of the total number of tweets – limiting the usefulness of the service. Nonetheless, Twitter analytics on an ad hoc basis provided some context for RQs 2–4.

## 5.5 Sampling

Qualitative analysis does not require a statistically derived sample in the same way that is necessary for quantitative analysis (Miles, Huberman & Saldana 2014). The preferred view is that sampling should be driven by fundamental conceptual questions, and should aim for a level of representativeness.

This study used a purposive sampling approach (Miles, Huberman & Saldana 2014) focused on six specific issues identified as having salience. To explore these issues, interviewees were selected from stakeholder entities identified as having an active interest in the case study, and their transcripts comprised the primary dataset.

Purposive sampling is consistent with a qualitative case study approach. For example, Zhang and Wildemuth (2009) write: 'samples for qualitative content analysis usually consist of purposively selected texts which can inform the research questions being investigated' (p. 309). Many of the organisations involved in this study are outlined in **Appendix 14 – Interviewee list**, and were based across Australia to gain a national perspective.

In this study the sample is 'relevant to... [the] conceptual frame and research questions' (Miles, Huberman & Saldana 2014, p. 37) because participants were heavily engaged and invested in the public sphere and in the management of NBN issues. Applying the recommendations of Miles, Huberman and Saldana (2014) helped determine which NBN issues to choose, which organisations to select, and which interviewees to select from those organisations.

The sampling frame, regarding issue selection and interviewee selection, was determined by the RQs and where the "phenomenon" of IM was likely to occur. The potential breadth of the interviews, and the volume of secondary material, meant that scope and boundary setting was vital to completion of the study.

Setting boundaries during interviews was balanced against the qualitative, open-ended questioning approach used. Resources and time were limiting factors for interviewees, but this was managed by understanding how long they were able to talk before the interviews commenced and pacing interviews accordingly.

There were multiple interviewees from some organisations that were central to the debate, particularly where one interviewee was interviewed but not able to go on the record, and another interviewee from the same organisation agreed to be identified. Anonymous and sensitive data was included in the dataset for coding and analysis, and informed the study's discussion and conclusions, even where it was not possible to directly reference it.

To mitigate the risk of over-representing practices from those organisations involving multiple interviewees, people from different levels and areas of the organisations were selected, so their data often covered different practices. All interviews, including anonymous ones, were conducted in 2014 and 2015.

### 5.5.1 Issue selection

The high-level NBN issues tracked for this study are set out in Table 1 (below).

**Table 1. Issues selected**

<b>Issue</b>	<b>Primary sub-issue</b>
1. Cost	Cost-benefit analysis (CBA)
2. Building the NBN	Asbestos
3. Security	Huawei
4. Digital divide	(Country versus city)
5. Regulatory settings	Structural separation – Telstra
6. Content	Copyright

The selection of issues developed through the course of the study from media content analysis and interview data, as more sub-issues emerged that afforded specific examples of IM affecting policy outcomes. Each issue contained multiple sub-issues.

In one sense, media content analysis indicates the existence of issues where IM has already failed – where issue managers aimed to keep the issues off the public agenda, and their successful management was dependent on this being achieved. However, this was balanced by also considering sub-issues that were managed behind the scenes, and did not feature prominently on the public agenda or in media reporting.

Although media content analysis indicated which issues were initially more prominent, further investigation and feedback from interviewees helped guide the research to uncover sub-issues which offered a more direct link between the debate and specific policy outcomes, or that were primarily managed behind the scenes.

When gathering data, Stake (2008) emphasises the importance of negotiating ‘the parts to be studied, as well as the parts not, and to do an in-depth study of a few key issues’ (p. 453). He notes that ‘the selection of key issues is crucial’ (2008, p. 448). Here Stake is not

using the word ‘issues’ in an IM context, although there is an overlap in terms of selecting the prominent and study-worthy elements of the case.

The decision to include an issue in the analysis was based on:

- Whether it had a public policy dimension (as opposed to being solely an internal organisational issue for one entity).
- Multiple dimensions, with the potential for differing perspectives across stakeholders.
- Relevance to multiple types of stakeholders (such as government, NGO, corporate, advocacy, regulatory).
- Longevity and “stickiness” of the issue on the public agenda, for instance favouring issues that lasted longer than one media cycle.
- Issue salience:
  - media content analysis showing comparative issue salience, including through the use of Factiva (results in **Appendix 12 – Issue salience data**)
  - textual analysis of secondary materials and reports, and
  - interview data, affirming salience, with interviewees also commenting on what they regarded as the most significant NBN-related issues.

The emphasis was on choosing issues that could impact more than one significant stakeholder in the debate. For example, an organisation such as Telstra may have a specific interest in the CBA debate, so Telstra may wish to downplay the higher cost of fibre technology, or may make public arguments about ways to reduce the cost in order to secure a more favourable regulatory or policy outcome. Equally, the Liberal Party could stress the issue of cost in their opposition to the NBN and to universal fibre.

Quantitative media content analysis with Factiva was used to confirm issue salience, focusing on six newspapers. These were selected to provide national coverage, and to avoid the study being entirely dominated by the debate in the eastern states.

Articles for quantitative media content analysis were examined according to pre-determined criteria (Miles, Huberman & Saldana 2014) including date of publication, name of the publication and the number of times a specific issue was mentioned. Similar quantitative analysis to track issues on the public agenda was successfully undertaken for

Reynolds' gun debate study (1997). Details are set out at **Appendix 12 – Issue salience data**.

Findings from interviewees helped determine when issues first emerged, although the periods listed in **Appendix 12 – Issue salience data** were the focal periods for primary analysis in the study. Most issues did not have discrete beginning and end points; instead they slowly emerged on the public agenda, then faded from it, and in some instances (such as copyright), came back onto the agenda. Most of the issues “simmered” on the agenda up to the time of writing.

Secondary research complemented the use of Factiva database searches to determine when the issues were most prominent. These results confirm only, on the basis of word searches, that the issues were prominent in the mainstream media in Australia for the relevant selected time periods. The relative number of references also provides some indication of comparative issue salience: structural separation and CBA were the most prominent issues.

An IBES report (2014) confirmed the prominence of the six issues selected for this study in the public debate. IBES data used media content analysis covering ‘the extent of coverage of the NBN in Australian newspapers’, ‘the key topics being discussed in leading Australian newspapers’ and ‘the content of editorials and opinion pieces on the NBN’ (2014, p. 34). Analysis of editorials from 2008–13 showed the dominance of three themes (IBES 2014, p. 38):

- the structural separation of Telstra
- scrutiny of the NBN business case, and
- the cost of Labor's NBN

The first theme corresponds to the issue of NBN regulatory settings, and the primary sub-issue of the structural separation of Telstra. The second and third most prominent themes correspond to the issue of the cost of the NBN, and the primary sub-issue, the question of undertaking a CBA (which is the central component of the business case).

Most sub-issues considered for this study, which emerged from the interview data, were also identified as prominent in the IBES study. For detailed results of the IBES media content analysis from 2008-2013 see **Appendix 15 – IBES results**.

The list of themes IBES identified would not be expected to correlate exactly with those addressed here, because issue selection for this study has been purposive and qualitative, supported by quantitative data on issue salience. Many sub-issues selected for this study have been kept largely out of public debate, but have nonetheless been prominent issues behind the scenes. The IBES study could not have reflected these issues because they did not feature prominently on the public agenda.

Numerous high-level issues were selected to ensure the study captured a broad overview of IM practices. This is because if only one or two issues were selected, it may have led to the study being dominated by a specific type of IM practice flowing from the nature of the issue. Selecting multiple issues allowed for:

- Examining the interaction between the issues.
- Examining a cluster of issues that share a broader project in common: the NBN.
- Choosing a variety of issues that have different lifecycles, time periods, internal and external organisational dimensions, and greater or lesser policy elements (although they are all policy-related at some level).
- Considering extensive secondary research materials.
- Comparing and contrasting the use of IM techniques with regard to each issue, as different issues required different SIM approaches.
- Overcoming a scenario where an organisation is not prepared to talk about one issue, allowing the researcher to explore the IM techniques used in relation to other issues.

The six chosen issues also involved an *expectation gap* and met the definition of “issue” as set out in the Definitions chapter. Parties to the public debate variously exploited this gap for their own strategic ends, particularly at the political level, where the opposition could utilise an expectation gap to support their arguments and attacks on the party in power.

**Appendix 16 – All issues list** sets out all the significant issues encountered for this study. For further background on how each of the major issues was selected, see **Appendix 17 – Issue selection background**. For an analysis of issue polarity for each organisation, and how the issues meet the definition of “issue” in this study, see **Appendix 18 – Issue polarity and perspectives**.

### 5.5.2 Interviewee selection

Interviewees were purposively selected from the major participant organisations in the NBN policy debate. There were 22 interviewees from organisations identified in the thesis: see **Appendix 14 – Interviewee list** for details.

Resistance was encountered from many interviewees and organisations, and it took more than 14 months of persistence in some cases to secure interviews that were essential to completing the dataset. All organisations central to the debate were interviewed for this study. At the political level, all senior participants in the debate, past and immediate present, were approached seeking their involvement in the study.

Unfortunately, the sensitivity of the subject matter and the nature of IM meant many participants did not want to be identified, nor did they agree to have their organisations identified – even when being quoted anonymously (reflected in the use of “Anon” for “anonymous” in quotes from interview data). In some cases interviewees backed away from what they had previously said on the record when the researcher went back to seek approval for the use of interview quotes in the thesis.

“Anon X” is used where “X” consistently refers to a specific interviewee. For some quotes, this numbering is not used, and an interviewee is simply referred to as “Anon”. In these cases the sensitivity of the subject matter necessitates this approach. Otherwise, consistent anonymous interviewee numbering is used. To help protect confidentiality only year dates are provided for numbered anonymous interviewees.

Where interviews took place over multiple dates, the date of the first interview is used as the reference date for the interview data from that interviewee. For brevity, and given all but two interviews occurred in 2014, interview dates are not provided in the text of the thesis; refer to **Appendix 14 – Interviewee list** to see interview dates, names and organisations. However, interview dates are provided where direct quotes from in-person interviews are used.

Some interviewees are also published analysts and commentators (e.g. Stanton, Fletcher), and so where their interviews are being referenced (without a direct quote), *no year is provided*, but where their published works are being referenced (as listed in **References** at the end of the thesis), *then the year is provided*.

Interviewees provided some highly specific examples of IM influencing policy outcomes, particularly through submissions, but some of these references have been omitted or generalised to protect the confidentiality of the interviewees. Details of triangulation, used to support conclusions, are not all provided in this thesis, due to confidentiality requirements.

Given the sensitivities involved, the researcher went beyond the requirements of UTS consent forms. Interviewees were individually contacted to clarify and confirm their confidentiality preferences. In most cases lists of quotes were provided to interviewees to enable them to reassess any sensitivity or confidentiality issues.

In some instances interviewees were content for full attribution to take place for specific quotes. However, the researcher, based on a view across the whole debate and all the participants, came to the view that the quote should nonetheless not be attributed due to sensitivity, and in these scenarios “Anon” was used.

Interviewees requested minor changes to some quotes from their transcripts, although this was discouraged. None of the changes affected the meaning of the quotes, and the changes only applied to quotes included in the thesis. The original interview transcripts, for the purposes of coding and data analysis, were left unchanged, to preserve the integrity of data coding and analysis.

Interviewees themselves expressed surprise at the level of co-operation from issue managers, which was better than anticipated before the study began; an anonymous interviewee said after the research was explained, ‘I’m surprised you’re getting anyone to talk to you’ (pers. comm.).

This study used real-world examples and direct data from IM practitioners so that ‘believable descriptions and explanations... that are true to real life’ (Miles, Huberman & Saldana 2014, p. 37) could be produced. Interviewee sampling criteria are set out in **Appendix 19 – Interviewee sampling parameters** (Daymon & Holloway 2011).

Interviewees ranged across roles in communications, regulatory and policy functions. This was unsurprising, given secondary research demonstrating that IM is dispersed across organisations, as the IM function does not necessarily sit with one designated “issue

manager”. A snowball approach to interviewee selection was also employed to help identify the best placed individuals to interview within each organisation (Patton 1990).

In light of the questioning, it was not essential that the interviewees had specific IM-related roles, such as “public affairs adviser”, as often an organisation’s issue response was developed and executed across the various functions of an executive, manager, regulatory affairs adviser or policy adviser.

Most interviewees were senior issue managers or public affairs executives, although there were some middle-level managers – particularly at organisations where multiple interviewees participated. This enriched the data, because while senior executives were sometimes reluctant to be frank, individuals at other levels within organisations were often open about their experiences.

All interviewees were uniquely placed in their organisations to give in-depth accounts of how they and/or their organisations used IM practices to influence public debate and policy. The inclusion of several non-executive issue managers was a result of the exigencies of access, but it did afford the study multilayered perspectives and some frank accounts of the practices used. Issue selection favoured multiple stakeholders, so that varying regulatory, public affairs and policy perspectives could be gleaned.

In some instances more than one interviewee was interviewed from the same organisation (at nbn, three interviewees participated). In other instances it appeared that only one person from the organisation would speak, but then an additional, more senior interviewee eventually came forward; this further opportunity did not reduce the importance of the data from the less senior interviewee.

It was not possible within the scope of this study to interview a large number of individuals across each organisation. To save time and resources, this study preferred interviewees who were exposed to more than one of the six issues being tracked.

Consultants were not generally interviewed, unless they had dual roles (for example, as a spokesperson for a party to the debate and in a PR agency). This helped to maintain a strong organisational perspective in the data.

The researcher considered whether to include journalists in the dataset; ultimately a decision was taken that this was not necessary. The dataset was already sufficiently rich

and voluminous, and a great deal of research has already been done on PR and journalism (Macnamara 2014b). While this study draws upon that research, the focus here was IM practices undertaken by issue managers. Many journalists would be unlikely to admit to having been influenced by issue managers, and in any event many of the public policy issues were managed *outside* the media.

## 5.6 Data coding and analysis

The analysis focused on ‘grounding the examination of topics and themes, as well as the inferences drawn from them, in the data’, and in modest ways aimed to ‘generate theory’ (Zhang & Wildemuth 2009, p. 2) on the influence of IM.

Drawing on Hsieh and Shannon (2005), Zhang and Wildemuth advocate:

Directed content analysis, in which initial coding starts with a theory or relevant research findings. Then, during data analysis, the researchers immerse themselves in the data and allow themes to emerge... The purpose of this approach usually is to validate or extend a conceptual framework or theory. (2009, p. 2)

This better reflects the methodology in this study. The researcher was immersed in the data, including the in-depth interviews, media reporting, secondary materials including submissions and reports, and artefacts provided or highlighted by interviewees.

Broader media analysis drew on qualitative approaches such as those put forward by Zhang and Wildemuth (2009), who note how qualitative content analysis can overcome some of the shortcomings of quantitative content analysis. Qualitative content analysis, as utilised in this study, enabled an examination of ‘meanings, themes and patterns’ in the text, allowing the researcher to ‘understand social reality in a subjective but scientific manner’ (p. 1).

Coding for IM practices was chosen as the primary means of “breaking open” and the large volume of interview data, and gaining an understanding of the IM practices being discussed in their broader context. Further textual analysis of the interview data was also undertaken, and this was guided by the findings from coding and analysis.

Node lists were developed largely deductively, but there was also an inductive element. An initial list of nodes was prepared based on the literature review, indicating the kinds of

IM practices that could be anticipated (e.g. using McGregor 1993, Harrison 2008). More nodes emerged as the data was coded and analysed. Whole coding categories (e.g. 'message strategy', 'content' and 'principles') came about inductively and were not initially anticipated (Saldana 2013; Zhang & Wildemuth 2009).

An exclusively deductive approach could have predisposed the coder/researcher to finding only known and anticipated IM behaviours, limiting the possibility of discovering broader insights from the data. Miles and Huberman note that 'a more inductive researcher may not want to precode any datum until he or she has collected it, seen how it functions or nests in its context, and determined how many varieties of it there are' (1994, p. 58).

A separate set of entirely inductive, uncategorised in vivo nodes was developed on the basis of interesting codes as they emerged. These did not particularly relate to either IM issues or practices, and some suggested further areas of research beyond the scope of this study. The most common types of codes employed were descriptive/open, interpretive and pattern codes (Myers 2013).

Myers notes that 'As a general rule... I recommend that almost all qualitative researchers should consider using QDA [Qualitative Data Analysis] software' (2013 p. 177); the study used NVivo. Microsoft Excel was used for fast data sorting and to generate graphs. The researcher also undertook two NVivo training workshops, the second being held with Dr Roger Vallance.

Depending on the QDA software, the literature mixes terminology around coding and nodes (MaxQDA, for example, does not use the concept of "nodes"). This study applies Saldana (2013) and Bazeley and Jackson (2013), which aligns with NVivo; it refers to "nodes" and "codes" – which means the same as "reference".

Coding category nodes were also developed. For example, 'message strategy' is a category node, with subcategory nodes 'content' and 'principles' contained within it. Saldana notes that 'some categories may contain clusters of coded data that merit further refinement into subcategories. And when the major categories are compared with each other and consolidated in various ways, you begin to transcend the "reality" of your data and progress toward the thematic, conceptual and theoretical' (2013, p. 12).

A lengthy node list was used; null nodes were not retained in the final analysis, because of the volume of interview data, the length of the full node list, and the need to keep the list at a feasible length for further matrix coding and analysis.

'IM practices' included 149 nodes in total, some of which were category or parent nodes (Saldana 2013). 'Issues' contained 35 nodes, again some of which were category or parent nodes. There were 623 codes for IM practices alone (unaggregated).

Other node lists were also developed for the study, including for in vivo codes. Duplicated nodes were avoided as this can lead to 'viral coding' with an 'ever-expanding set of nodes that rapidly becomes unmanageable' (Bazeley & Jackson 2013, p. 2384/6332).

There was a range of ways to "slice" the data for this study. Coding was used to make sense of the data, but beyond this, in-depth analysis examined specific codes that denoted how interviewees described IM practices, and how they perceived their effectiveness. The bulk of the coding looked for specific IM practices, and then coded these in two places:

1. at the node corresponding to the **IM practice**, and
2. at the node corresponding to the **issue** to which the practice related.

For example, if an interviewee said s/he published a media release to influence debate on the CBA, this was coded against 'media release' and against 'CBA'. Arguably autocoding could have determined which issue the IM practice should be coded against. However, this option was eliminated because it would not detect context and nuance, and so could lead to more inaccurate results than would be expected through manual coding.

Furthermore, autocoding would not pick up different ways of describing issues (interviewees did not necessarily describe issues in the same terms), and would not permit the addition of inductive codes in the issue node list.

Other separate node lists covered interviewee comments on other organisations' IM approaches, IM impact testing and measurement, impact on debate, impact on policy, and purely in vivo nodes – those not related to issues or practices.

'Impact on debate' and 'impact on policy' node lists were used to identify examples where interviewees believed a practice influenced debate, debate impacted policy, or

practices impacted policy. These were used to develop matrix coding tables (**Appendix 20 – Issues and influences matrix** and **Appendix 21 – Practices and influences matrix**). It was not always clear which practice or practices data coded at these nodes related to; often interviewees were referring to multiple practices in combination when they found they had an ‘impact on debate’.

Coding and analysis commenced before data collection was complete, to ensure the data being collected was of a suitable standard to support the scope of the study and to answer the RQs. This ensured interview technique and questioning could be calibrated early in the fieldwork process to achieve consistency and to confirm the applicability of the initial deductive nodes and coding categories (Schilling 2006; Weber 1990; Zhang & Wildemuth 2009). NVivo was also used for cluster analysis on IM practices, although this did not yield useful results.

A transcript from one of the first interviews (Anon 2) was used as a test transcript, with coding and analysis performed early in the study. As Saldana notes, ‘rarely will anyone get coding right the first time. Qualitative inquiry demands meticulous attention to language and deep reflection on the emergent patterns and meanings of human experience’ (2013, p. 10). The Anon 2 transcript was recoded two further times, allowing basic coding rules to be developed that ensured consistency across the data.

Where IM practices were repeated in the transcript, this was generally coded at the relevant nodes again – unless it was clear that the same specific example of an IM practice was being referred to. Where there was ambiguity, another code was created. This also meant that the number of codes at a node reflected the level of emphasis and importance in the interviewee’s mind. Detailed rules were developed to maintain consistency (see **Appendix 8 – Coding rules**). The primary unit of analysis in the data – specific IM practices – was defined early (Zhang & Wildemuth 2009).

The research involved multiple passes on the data from all the interviews. In most cases it was reviewed a minimum of three times – in some cases more frequently – ordinarily at points when:

1. the interview was first recorded (single interviewee – the researcher – for all interviews)

2. the transcript was reviewed for accuracy and checked against the audio recording, and
3. the interview data was coded (RQs 1 and 2).

This achieved a level of consistency and reliability across transcripts. This was particularly advantageous where the interviewee had a strong accent, or the interview took place over a poor phone line. There were manifold benefits to the researcher being the sole investigator (Bazeley & Jackson 2013), sole interviewer and sole coder for all data – eliminating any potential consistency or intercoder reliability concerns.

## 5.7 Trustworthiness

Drawing on Guba (1981), Shenton notes four criteria for a study for it to have trustworthiness (p. 64):

- a) credibility
- b) transferability
- c) dependability, and
- d) confirmability.

Lietz and Zayas (2010) adopt almost the same criteria, other than using ‘auditability’ instead of ‘dependability’. Lincoln and Guba (1985) posited a link between credibility and trustworthiness. This study establishes credibility, and therefore trustworthiness, through employing ‘research methods well established both in qualitative investigation in general and in information science’ (Shenton 2004, p. 64).

Shenton (2004) and Lietz and Zayas (2010) were applied in this study, with an emphasis on credibility. The research design ensures a level of rigour, particularly in the way data collection was conducted, and in the way interviews were transcribed and coded.

This study applies the test set out in Kidder and Judd (1986) to judge the quality of research design: ensuring construct validity, internal validity, external validity, and reliability. The study does this partly through consistent application of the theoretical lenses of agenda setting, priming and framing to IM practices in the public sphere.

To support credibility, Shenton recommends ‘thick description of the phenomena under scrutiny’ (2004, p. 69). Although it derives from interpretive ethnographic traditions, it

nonetheless adds depth to a case study such as this (Lietz & Zayas 2010). Thick description also provides broader context, and assists the assessor in establishing whether the findings 'ring true' (Shenton 2004, p. 69).

This study has some transferability across the field of IM – although it is anchored in its subject matter of ICT policy. Insights from this study could inform the application of IM to other fields in comparable circumstances.

Dependability, Shenton notes, can be more fraught for humanist or constructionist qualitative researchers than those taking a positivist approach. This chapter is written so a future researcher could repeat similar work, although s/he could not expect to obtain precisely the same results, due to the qualitative nature of the study. Establishing credibility in this study goes some way to establishing dependability (Lincoln & Guba 1986; Shenton 2004) and auditability (Lietz & Zayas 2010).

Shenton (2004) and Lietz and Zayas (2010) also note, 'the concept of confirmability is the qualitative investigator's comparable concern to objectivity' (Shenton 2004, p. 10). Reflecting Silverman, and naturalistic ethnographic approaches, Shenton contends that in establishing confirmability it is essential to ensure that results and findings have derived from the interviewees (and to some extent secondary research), rather than the researcher's pre-conceived views, preferences or characteristics.

Given the place of human perspective in a study such as this, even a positivist researcher would likely face a challenge in escaping human subjectivity. While this is more pronounced in purposive, directed qualitative research, it can be argued that any study designed by humans will, at some level, be subjective.

Following Miles, Huberman and Saldana (2014), this study applies a level of objectivity (to the extent this is achievable given the research design) and confirmability, while acknowledging the author's inevitable presence and in the writing.

Interviewees were volunteers, so only those who were prepared to offer answers freely were included. As a counterpoint, some participants may have felt some obligation to participate, given the profile of the issues under consideration. However, in light of the seniority and public affairs experience of most interviewees, it can be assumed they were able to make this judgement about participating for themselves, and also generally

capable of dealing with difficult interview questions. The voluntary nature of the study helped ensure a level of honesty (Shenton 2004), and iterative questioning was employed to support data veracity.

Peer scrutiny and feedback was sought at conferences and qualitative analysis workshops through the course of the study. Techniques of reflective commentary and progressive subjectivity were applied as data was gathered and analysed.

Data saturation and redundancy were observed across the interviews: separate interviewees at different organisations sometimes repeated perspectives and insights on how IM practices were used and their effects. This helped to confirm the veracity of the data and insights, and served to strengthen the study's findings.

Shenton (2004) argues that participants should be given the opportunity to undertake 'member checks', where they have 'read any transcripts of dialogues in which they have participated' (p. 68). However, extensive member checking was unnecessary in this study: it could encourage over-analysis by participants and, in a worst-case scenario, could provoke an interviewee to change his or her mind and decline to have interview data used in the study.

In place of member checking or interviewee validation, the study established the veracity of participant observations using redundancy and corroboration from other interviewees or data sources. Going back to individual interviewees to discuss findings would have been inappropriate and unfeasible in the circumstances of this study and could have created unnecessary concern amongst participants.

Nonetheless, there was some member checking where pivotal transcript extracts required more explanation or minor correction. Potentially sensitive quotes were checked with interviewees: not only for accuracy and meaning, but also to protect their confidentiality where required.

Conclusions were checked with individuals who have had many years' experience in ICT policy fields. In the interests of advancing the trustworthiness of the study, elements of the discussions, implications, and all the conclusions were checked with four senior public policy practitioners – all of whom have PhDs, and three of whom are specialists in ICT policy. One of the four also has experience in PR and IM.

Audio recordings of interviews were retained. Where specific follow-up regarding the meaning of participants' answers was necessary, this was done as required. See **Appendix 11 – Establishing trustworthiness** for a more detailed account of how this study establishes credibility, transferability, dependability and confirmability.

## 5.8 Ethics

Ethics approval was granted on 2 May 2013. Information Sheets and Consent Forms were prepared, approved and distributed to interviewees, who all signed the Consent Forms.

A potential risk was identified relating to political and organisational sensitivities regarding major government policy decisions and commercial undertakings. Participants were not asked to reveal any information that was protected under relevant legislation pertaining to privacy, security, legal privilege, or commercial confidentialities. However, the research probed to gain a transparent and frank disclosure of the activities that informed and influenced selected IM practices.

Participants themselves, given many were at senior levels within their organisations, and were aware of the implications and practice of IM, could be expected to be aware of potential risks in this regard. All participation in the study was voluntary, and participants were offered anonymity.

The researcher recognised the irony that the interviewees could perceive their participation in the study as part of their own IM process, managing the issue of *this study itself* using IM, and weighing their organisation's involvement in a highly politicised and charged space.

The UTS Human Research Ethics Committee (HREC) was satisfied with risk mitigation strategies adopted to address any potential ethics risks associated with this study. Additional ethics reporting was undertaken during the course of the study, in line with HREC requirements.

This chapter has set out the approach, methodology, methods, sampling, and data coding and analysis techniques used in this study. Using an interpretivist approach, with a qualitative methodology, and an NBN case study, this chapter has described how elements of the research approach work together to enable the study to address the RQs, and the gap in existing knowledge as identified earlier in Section 3.4.

## 6. FINDINGS – IM PRACTICES

This chapter summarises the findings of this study, outlining the results of data coding and analysis, which forms the primary dataset. The range of IM practices was larger than initially anticipated; these practices were identified across major NBN policy issues. More specific analysis of practices that relate to each of the issues tracked is detailed in the following chapters.

A complete list of all IM practices encountered in the interview data is set out at **Appendix 22 – All IM practices**, whereas Figure 10 (overleaf) shows all practices with four or more codes, and the number of sources/interviews covered by the codes at that node. High level category nodes (in person, media, mediated one-to-one, mediated one-to-many) are not included in Figure 10. Across all the data in person practices were found to be the most common.

All parent nodes are aggregated in Figure 10 (e.g. 'provide information' includes the child node 'provide information – reasons, explanation'). In this and the following chapters nodes are normally aggregated, unless specified otherwise.

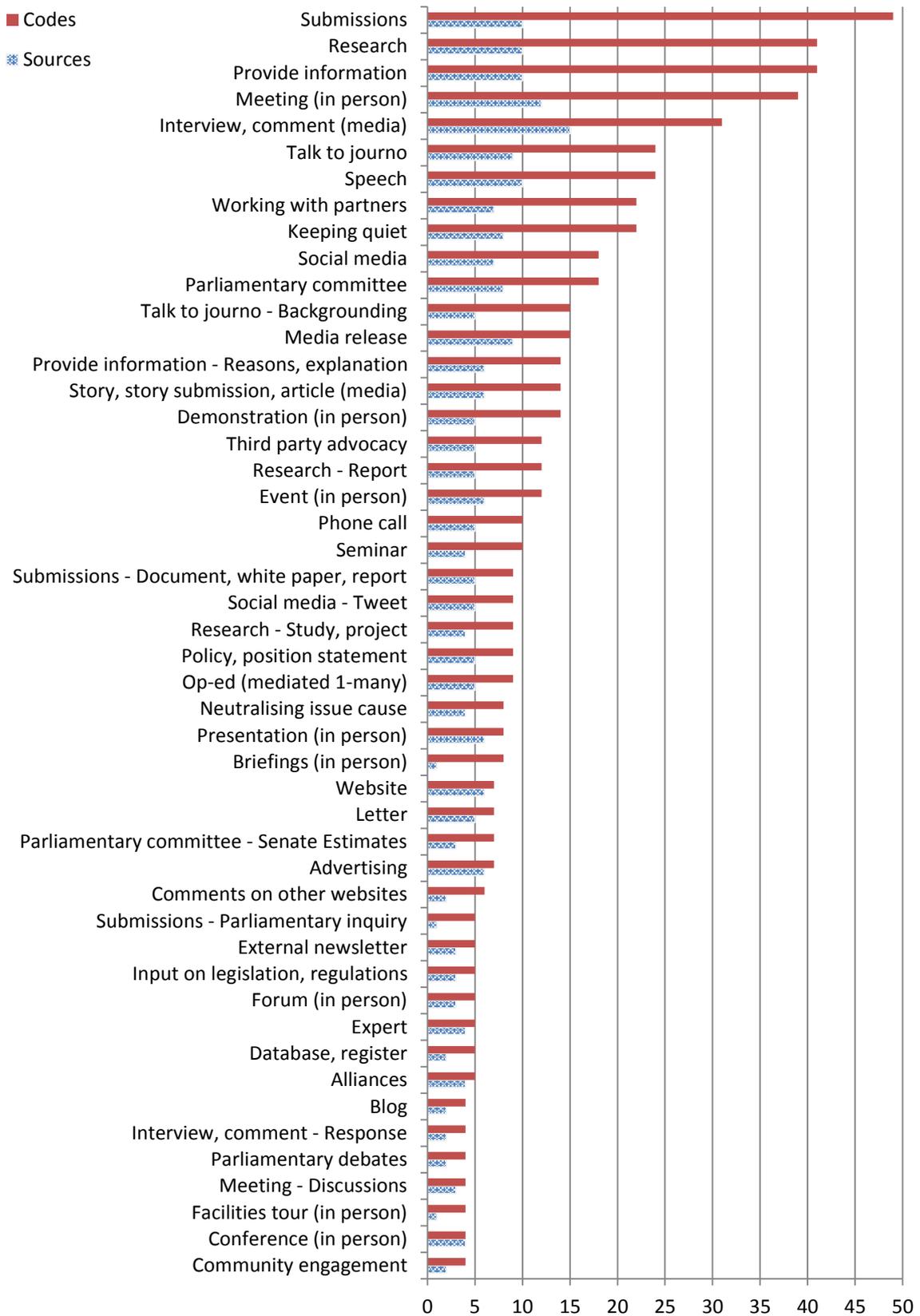


Figure 10. Common IM practices

There is potential for overlap between the IM practices presented in Figure 10; this is an unavoidable consequence of the in-depth interview method in combination with in vivo coding. In these situations practices were only coded against the most likely best match node, based on the natural language used by the interviewees. See **Appendix 8 – Coding rules** for further details.

Queries could be raised about some of these practices: for example, ‘keeping quiet’ is an inverse practice, in that it may involve *doing nothing*. However, even a decision not to engage, in combination with ‘refer elsewhere’, is an IM practice, which emerged as a common practice in vivo.

Keeping quiet could proactively affect internal communications, for example, where staff are instructed not to speak to the media but to refer queries to a central point within an organisation. Adding such nodes is in keeping with the methodology: starting with a series of anticipated practices (on the basis of the literature review), and augmenting these with additional nodes that emerge from the data.

Some telecommunications companies were outliers on the interview data and media analysis in terms of their level of engagement in the public policy process and their use of IM practices. An unidentified interviewee from a telecommunications company expressed the view that significant engagement in the public policy development process might not lead to outcomes that were any different to not being so engaged.

The basis of this view was that policy was commonly the outcome of political prerogatives, and that debates about such prerogatives were, more often than not, well informed without additional contribution – whether from the company itself or from an external lobbyist. In the view of the unidentified interviewee, it was not seen as necessary to use a lobbyist because the company could say what it thought just as well as a lobbyist could (if not better).

Overall, data from outliers such as this did not substantially detract from the conclusions of the study, because their approach to the debate varied so greatly from almost all other participants. Their approach also diverged from PR and policy theory – as per the literature review and theoretical framework used in this study.

However, even this outlier found that ‘submissions’ were effective and were found to be influential in achieving policy outcomes. This finding corroborated the overall efficacy of submissions across the interview data. This outlier found that although submissions did not enable them to achieve all of their policy and regulatory objectives, they did secure important changes to bills going before parliament. For them, ‘submissions’ constituted their primary means of engagement in policy development processes, as well as discussions with civil servants in government agencies.

Based primarily on interviewee accounts, this analysis demonstrates overwhelmingly that ‘submissions’, ‘research’, ‘providing information’, ‘meetings’ and ‘interview, comment’ are the most common IM practices in this case study. This also demonstrates that a significant portion of IM work is done using formal, largely transparent methods – namely through ‘submissions’.

‘Submissions’ in Figure 10 includes submissions to or into consultations, documents, white papers, reports, the relevant Minister’s office, parliamentary inquiries, reviews, or to the Senate. ‘Research’ includes academic publications, journal articles, papers, reports, studies, projects, to support partners, targeted consultation and white papers. Finally, ‘provide information’ includes ‘providing information – reasons, explanation’, which is also listed separately in Figure 10.

Given the nature of NBN issues, it could be expected that ‘submissions’ is the most common practice for IM in an NBN public policy context. This reflects the hotly contested nature of the issues under discussion, and that entities involved in the public debate are being provided an opportunity to comment on policy development processes. However, Figure 10 does not indicate whether contributors’ inputs were listened to or acted upon in policymaking processes.

‘Providing information’ was not an anticipated practice, and emerged as an in vivo node from the data. Interviewees emphasised the value of providing information as a practice in managing issues, and this consistently appeared through the data.

Providing reasons and explanation was prominent in interview data from current and former nbn employees. There is also a close relationship between ‘submissions’ and

'research'; often policy actors will ground their submissions in research, which they may have commissioned to support their arguments.

'Social media' was tenth overall, with 18 codes, covering Facebook, LinkedIn, message boards (such as Whirlpool), Twitter and YouTube. This shows it has a level of perceived usefulness in public policy IM, but is not used as much as may be anticipated in light of broader communications trends.

It can be inferred that the frequency of references to a specific practice indicates its prominence in interviewees' minds, and may bear on its perceived effectiveness.

Frequency, it is noted, does not equate with effectiveness.

However, an interviewee would not be expected to use a technique repeatedly, and report using it to the researcher, that s/he considered ineffective. There may be exceptions: for example, a practitioner may spend time drafting and disseminating largely ineffective, unreported government media releases, at the behest of a junior ministerial adviser or a misguided public service executive, and contrary to his or her better judgement.

There was some correlation between the most commonly used practices and the practices perceived as comparatively more effective (see **Appendix 21 – Practices and influences matrix**). Practices interviewees perceived to be effective in influencing debate included: 'advertising', 'events', 'meetings', participating in 'parliamentary committees', 'speeches', 'information papers' (ACCC), 'providing interview/comment', writing a 'letter to the editor', 'phone calls', writing an 'op-ed' (opinion-editorial), 'neutralising the issue cause', 'providing information', 'research', 'submissions', and finally, 'working with partners'. These practices are explored further in the following chapter with detailed examples in relation to each issue tracked.

An in vivo parent node was created for an agency's overall 'IM approach'. In descending order of frequency, common approaches included: operating behind the scenes, responding quickly, lobbying, managing expectations, not putting things in writing, being proactive and taking opportunities.

## 6.1 Message strategy

Interviewees frequently spoke of their messaging strategy in the context of how they used IM practices, and so the category node 'message strategy' emerged.

Referencing Hall (1961), Varey considers a message to have three components: a *set* ('distinguishable combination of parts'), the *isolates* ('the component parts of the set') and the *pattern* (2001, p. 86). He also considers messages to have properties of content, structure, format and source.

Of the message strategies, there were 28 codes for 'educate' with a wide spread across seven data sources, making this the most common strategy referred to by interviewees. Beyond this, 'refer elsewhere' had 12 codes, followed by using a 'spokesperson' (five codes), then 'case studies', 'examples' and 'shift focus' each with three codes, and finally with two codes, 'limit stakeholder engagement' and 'thought leadership'. This may reflect the content-heavy nature of much messaging in public policy debate, where educating as a focus of messaging could be an effective strategy.

Even the simplest IM messages occasionally had unexpected results; data from iiNet and nbn suggested a level of unpredictability in stakeholder reactions. Anon 18 from a telecommunications company described a situation where messaging caused a curious reaction from customer stakeholders:

The strangest batch of customers we ever had were OzEmail. When we bought OzEmail, nothing changed for the customer. And we had made other acquisitions prior to that, and our customer communications are usually simple... in those days there was a lot of dial-up. We would say, "The number's not changed, you still dial the same number, you don't have to change any of your settings, your email address stays the same, there's nothing to do, but welcome..."

Most of the customers just say, "Okay," you know, put it in the bin. OzEmail customers hammered the call centre, "What does this mean, there's nothing for me to do? What does this mean, nothing changes?" (2014, pers. comm.)

The subcategory node 'content' emerged during coding for 'message strategy', and then within 'content', another subcategory node, 'principles'. 'Content' was populated as interviewees spoke of the content of the messages they used to manage issues.

'Simplifying complex messages' and creating a 'narrative' were the most common approaches to message content, with 12 codes each (narrative was aggregated). Simplifying messages was a theme across all the data, and it can be explained with reference to the complex broadband policy subject matter involved.

Other content nodes included 'global comparisons' and 'using data' (both 10 codes), 'cut-through arguments' and 'language' (both six codes), highlighting 'points of difference', 'addressing misinformation', 'challenging assumptions' and saying 'it's government policy' (all five codes). The most common narrative was around 'nation building, transformation' (five codes).

Many interviewees referred to principles that guided their decisions around message content, and at a higher level, message strategy. 'Key messages' were emphasised in data on message content, with 15 codes across eight sources. In descending order, remaining principles guiding message content were 'consistency', 'simplicity', 'transparency, honesty' and 'targeting'. The focus on 'key messages', educating and simplifying complexity, suggests that at the core of IM, at least in a public policy context, there is a need to adhere to sound communications and messaging practice (e.g. Varey 2001).

This chapter has summarised the overall findings on IM practices used by participants in the public debate, showing that 'submissions', 'research', 'providing information' were the most prominently reported practices. It also reported that 'submissions', which are often public and transparent processes, were essential for organisations to engage in debate – even for outliers on the data. Finally, this chapter reported on message strategies adopted, demonstrating an emphasis on education across IM communications.

## 7. FINDINGS – INFLUENCE OF IM ON KEY ISSUES

Issue managers explained that they aimed to influence the discussion of public policy issues in the debate and to influence policy. This chapter considers each of the major issues tracked: cost (CBA), building the NBN (asbestos), national security (Huawei), the digital divide, regulatory settings (the structural separation of Telstra), and finally, NBN content (copyright).

This chapter follows the data that emerged from interviews and textual analysis of secondary sources in detail. Participants in the debate had different perspectives on each issue, and for each participant and from an organisational perspective the issues were at various times positive, negative, mixed, neutral or not applicable. For a summary of stakeholder perspectives, see **Appendix 18 – Issue polarity and perspectives**.

IM literature contends that IM practices *do* influence the media, public debate and public policy – on some levels, and on some occasions (Heath 2009; Jaques 2014; Palese & Crane 2002b). This study assumes that this influence occurs to varying degrees, and so it does not aim to re-prosecute that argument in detail.

Matrix coding was also used to determine influence on the debate and policy, broken down by issue (**Appendix 20 – Issues and influences matrix**), and by IM practice (**Appendix 21 – Practices and influences matrix**). However, this data is merely *indicative* of the relative effectiveness of a particular IM practice. During interviews where a number of practices had been discussed, it was not always clear which specific practice had the primary influence on debate or policy, or whether the interviewee was referring to a set of practices in aggregate.

There were 46 codes describing an interviewee's belief that practice(s) had had a 'positive impact on the debate' (from an organisational perspective), and 14 codes for the 'debate impacting policy'. This suggests some connection between the debate and policy.

However, it is likely that this connection is under-represented in the resulting 14 codes, and that this does not fully represent the link between the NBN debate and policy.

Interviewees may not have made this connection at the time the impact occurred, and many would not have been in a position to assess the extent of the connection between the debate and policy outcomes.

In total, 67 codes addressed IM practices impacting policy directly or indirectly. This included 24 codes (unaggregated) for IM practices ‘linked to an impact on policy’, an additional 20 codes for ‘change’ to policy, 17 codes for the ‘creation of new policy’, and six codes for ‘maintaining’ policy. This demonstrates the utility of IM practices for changing or creating policy (see **Appendix 21 – Practices and influences matrix**).

**Appendix 20 – Issues and influences matrix** shows that comparatively, interviewees believed they had more impact on debate regarding the issues of digital divide (six codes), asbestos, battery backup, choice of technology, CBA and structural separation (all with three codes).

The reason ‘digital divide’ has six codes could relate to the issue’s broader policy and philosophical underpinnings. Issues where interviewees’ use of IM practices influenced policy outcomes (on an aggregated basis) included SAU (eight codes), structural separation and battery backup (seven codes each), and asbestos (four codes).

The summary data on influencing debate and policy with specific practices reflects that the most effective categories of practice for influencing debate were: ‘providing information’, ‘in person – events’, ‘media – interview, comment’, and ‘neutralising an issue cause’ (in descending order of perceived usefulness). Practices found to be most effective at influencing policy were one-to-one briefings in person, and submissions.

When comparing the relative effectiveness of different types of practice overall, ‘in person’ practices, and ‘providing information’ both appeared effective at influencing the public debate. As reflected at **Appendix 20 – Issues and influences matrix**, IM was effective across all the primary issues tracked – except Huawei.

The following subsections expand on the summary data discussed above, providing detailed examples of how practitioners used IM practices, and how they perceived these practices as influencing the debate and policy in relation to the primary issues and sub-issues tracked for the study.

## 7.1 Cost

The federal Labor Government’s policy was to connect every household to the NBN, using FTTP (ALP 2009). However, a Liberal-National Coalition government came to power

(referred to as the “Liberal Government”) in September 2013. Their NBN policy was based on FTTN, complemented by other technologies – using a MTM model.

FTTN means running fibre to local hubs, to which homes and businesses in turn connect. In 2009 Fletcher wrote that FTTN would ‘not be as advanced as the new networks being installed in the United States... or the networks in Japan and Korea. Those networks are fibre all the way’ (p. 14).

The MTM policy was designed to reduce costs by using a mix of technologies to deliver broadband speeds; most households will not receive a fibre optic connection in the MTM rollout. The NBN has remained highly politicised, especially in the lead-up to the 2013 election. As the Liberal Party argued at the time:

Labor’s costly, delayed plan to upgrade broadband has dominated the public policy digital agenda for the past six years. Many Australians have been misled into thinking that unless we get Labor’s NBN we cannot be a successful, sophisticated 21st century economy.

That is not true. Nevertheless, broadband – particularly achieving universal access as soon as possible – does matter. That is why the Coalition will upgrade broadband for households and businesses with poor connectivity as soon as possible and ensure all Australians can participate in the digital economy. (2013, p. 4)

The high cost of the NBN, with varying Labor and Liberal estimates, and debate about the amount that should reasonably spent on the NBN, has remained a prominent issue in the public debate.

### **7.1.1 Cost-benefit analysis**

The cost of the NBN, and whether a CBA should be undertaken, has been an “unsettled matter” (in terms of the definition of “issue” in Section 2.1) in the NBN debate.

Governments and industry often prepare a “business case” to establish the viability of a major project before undertaking it. A significant component of this business case is the CBA (e.g. NSW Treasury guidance, TPP 08-05), which helps determine whether the project will deliver value for money.

CBA's can involve considerable economic complexity, as they are required to predict future economic trends and changes. Governments provide guidance to assist agencies in conducting CBA's (e.g. NSW Treasury guidance TPP 07-05). For an infrastructure project of the NBN's size, interview data reflected the view that for some media, academic and political commentators it was essential that a CBA be undertaken; for nbn, having a CBA in place could help legitimise the NBN and secure nbn's future.

Interview data and secondary sources supported the view that the detail of the CBA could help determine the type of NBN rolled out: there may be a strong business case for a FTTN NBN, but not for a FTTP NBN; or the cost of the FTTP NBN may not be justified when measured against the benefit it would deliver.

Both the strength of the business case and the absence of a CBA were prominent NBN cost issues – as reflected by quantitative issue salience data and the IBES 2014 study. However, part of the controversy derived from the question of whether a CBA was appropriate for a project of this nature, and which factors should be included in the CBA. Interviewees from Labor and Liberal sides of politics diverged widely on whether there should have been a CBA, on its timing, and how it should have been undertaken (Conroy; Fletcher).

Interview data from a number of interviewees revealed that this issue was an unsettled matter external to organisations, and one that nonetheless affected their credibility. The course of the issue also had implications for other participants in public debate, to greater or lesser extents.

Findings in this study highlight policy challenges associated with large, future-focused infrastructure projects. The following questions, regarding CBA's and infrastructure projects like the NBN, emerged from the interview data and secondary materials:

1. is it necessary to do a CBA?
2. is it possible to do one?
3. if one was done, would the results be of any empirical or objective use?

It follows that the potential for a more accurate and measurable result from the CBA supports the argument for conducting one. Regarding question (3) above, if the results are of limited use due to the complexity of the calculations involved and the level of

predictive accuracy required, perhaps the usefulness of the CBA is unlikely to justify its significant cost. It may be that, in an environment where the answers to any of the above questions are negative, doing a CBA would be unethical because of the attendant public expenditure.

In late 2013 and early 2014 the Liberal Government announced multiple reviews into the NBN project, including the *Vertigan Review*. This was made up of three reviews: the *Statutory Review, Independent Cost-Benefit Analysis of Broadband* (“*Vertigan Review – CBA*”), and the *Market and Regulatory Review* (collectively referred to as the “*Vertigan Review*”).

The *Vertigan Review* can be regarded as the expression of IM practices when viewed through analytical lenses adopted for this study. However, the *Vertigan Review* is nonetheless useful for context and background. A further *Scales Review* was announced in early 2014: an ‘independent audit of the NBN public policy process... that led to the establishment of NBN Co’ (DoC 2014a).

A feature of the NBN debate has been the use of costly reviews of previous government NBN decisions and policy settings. These reviews were supposedly framed so as to cut through ‘a web of spin, obfuscation and exaggeration’ (Turnbull 2013a).

However, insights gained from interviews and broader textual analysis would suggest a significant motivation behind the numerous NBN reviews undertaken was the achievement of political goals, and to enable the Liberal Party to further tarnish the previous Labor FTTP plan. Generally the reviews have supported current Liberal Party policy directions, raising questions about their independence.

The Terms of Reference for the *Vertigan Review – CBA* were:

To analyse the economic and social costs and benefits (including both direct and indirect effects) arising from the availability of broadband of differing properties via various technologies, and to make recommendations on the role of Government support and a number of other longer-term industry matters. (Turnbull 2013b)

The CBA issue is linked to the choice of technology for building the NBN. If one technology is more likely to return a greater benefit for a lower cost, then that technology is arguably more likely to be chosen for the construction of the NBN.

The major parties accused each other of using framing to manipulate the CBA debate; the Liberal party accused Labor of focusing on 'justifying Labor's mismanaged, costly, delayed NBN by framing it as a pre-requisite for global digital greatness' (Liberal Party 2013a, p. 12).

It is worth noting with reference to the political debate that Liberal Party election materials in the lead-up to the 2013 election lacked a detailed alternative plan for nbn, but did contain lengthy criticism of the existing policy model at the time. The Liberal Party mainly focused on an NBN model that was built around FTTN, and emphasised lower costs and a faster rollout.

The NBN policy debate over recent years has spanned all aspects of the public sphere, spilling across industry, academic, political, technical and mainstream press, as indicated by content analysis informing this research.

Successive governments appeared unable to prosecute the need for an NBN. iiNet argued that 'the cost benefit analysis and the public debate... [were] being conducted in a policy vacuum', and that the focus remained 'on download speeds for domestic entertainment' (iiNet 2014, p. 2), which may have unduly narrowed the debate and diverted it from uses of new NBN technology. iiNet argued that the *Strategic Review* (nbn 2013) did not set out specific benefits, only costs.

In iiNet's submission, they argued that the national objectives of the NBN should include:

- national productivity
- job creation
- export opportunities
- regional development
- industry development
- improved competition, and
- improved social outcomes. (2013, p. 2)

iiNet's argument was supported by national broadband projects in other jurisdictions, drawing particularly on Singapore's iN2015 goals, which on a simple comparison appear to contain significant vision and ambition – even though they were developed in 2010.

iiNet noted that a range of key areas were omitted from the debate over NBN infrastructure and the purpose of the NBN, and that these should have been more fully investigated in the CBA discussion:

- symmetry in communication speeds (upload and download) – and the need to focus on the supply side, to provide broadband services Australian consumers will want to use
- international competitiveness – and the presentation of mature overseas services to Australian consumers
- wholesale or retail – with nbn not only acting like a wholesaler, and
- complexity creates cost – additional technologies require further interconnection investment.

Framing the CBA issue sheds light on how the Australian electorate developed views on the NBN and its relative merit. The question of cost-benefit goes to the heart of the broader public NBN debate: whether the project should have been continued at all, its purpose, and what the technology mix should be (FTTN, FTTP, HFC, satellite, etc.).

Some have criticised an apparent lack of clear purpose, with Li asking 'what is the primary object of the NBN project?' (2012, p. 227). Various interests, including political parties, had differing viewpoints on why the NBN was being built. On the basis of secondary materials considered in this study, and interviewee data, the primary reasons for the NBN are:

- structural separation of Telstra, and
- to provide faster, more reliable internet services across Australia

Secondary reasons could include:

- promote fair competition among carriers
- advance the Australian (digital) economy
- address the digital divides, and

- improve service delivery in health, education et cetera.

These goals demonstrate that the NBN is many things to many people. Successfully tackling the CBA issue could have helped the ALP prosecute its case for building the NBN; interviewees commented that the fact a CBA had not been done made it difficult to talk about the NBN in terms of costs versus benefits. An interviewee from nbn explained:

For us the cost-benefit analysis argument was a very frustrating one. I think if you took a poll of people in the company [nbn], they would have all said, “God, we wish the government had’ve done a cost-benefit analysis.” The absence of one just became an incredible distraction and frustration. The horse had bolted. (Anon 15 2014, pers. comm.)

The initial decision not to do a CBA continued to haunt the ALP, and the more the debate evolved in the public sphere the more voters appeared to support the notion of undertaking a CBA. David Havyatt, former Special Adviser to Senator Conroy, noted that ‘the further we got away from the point where we decided not to do one, the harder it was to change the decision’ (2014, pers. comm., 14 April). The ALP maintained that the NBN was ultimately going to turn a profit, and pay back the government investment, meaning a CBA was not necessary (Conroy).

A counterpoint is that the ALP may have been unsure of the outcome of a CBA, which would favour *not* doing one: ‘the old adage that governments never have a review if they don’t know the answer in advance may have played out in that respect’ (Stanton 2014, pers. comm., 7 May).

This data suggests that doing a CBA at an earlier stage would have been a useful way to influence public debate, or at least to neutralise damage from the issue for the ALP. This example reflects the role of research and the preparation of reports in the policy debate. It also shows the importance of timing when agencies and individuals aim to influence the debate and policy. Additionally, the CBA example shows the usefulness of basing issue communication on a public policy artefact as the foundation for messaging in the debate.

From the outset it was essential for the government (references to “the government” normally refer to the “Australian Federal Government”) to prosecute the case for the NBN:

The Australian government should have made it clear how it envisages the business objective of NBN Co aligning with NBN's social objectives prior to commencement of the rollout. Although the government reiterated that the NBN is a nation building exercise, it could have highlighted such an agenda more strongly by offering evidence of the... social and economic benefits in areas such as healthcare and education. (Li 2012, p. 227)

Short of undertaking a CBA, prosecuting the argument for the NBN required highlighting its applications; interviewees such as Anon 2, a former senior nbn communications team member, believed this was part of their role. Interviewees used IM and general PR and communications practices in the public sphere to demonstrate uses of the NBN:

In one of the demonstrations we had at the Bunya, which is the first housing estate to be fibre ready in Sydney's west, we chose to have Microsoft on board and they demonstrated some of their new gaming technologies, but including one where you could just wave your arms about... Xbox Kinect... They used another technology... to demonstrate exercise programs... where you had a health carer at the other end of the high-speed connection. (Anon 2 2014, pers. comm.)

In the context of a negative broader social narrative around the NBN, these specific demonstrations helped to frame the NBN debate in terms of the NBN's ability to help address specific social challenges associated with isolation, including the provision of medical care to people unable to visit a doctor or a hospital.

The interviews strongly demonstrated the impact of personality on the effectiveness of IM programs and approaches. Senator Stephen Conroy's approach in the role of Communications Minister contrasted strongly with that of his opponent – Malcolm Turnbull.

Interviews and secondary research supported the view that personal styles, and conflicts between Conroy and future Labor leader Bill Shorten while Shorten was in a union role, had an impact on issues related to building the NBN – including the presence and handling of asbestos.

Personal approaches to managing issues affected the success or failure of specific IM practices. Interview data and media reports suggest that didactic, forthright approaches

at times adversely affected audience receptiveness to arguments in favour of the NBN.

This was not seen with Turnbull's diplomatic approach to the NBN debate, which allowed him to successfully make arguments in favour of the Liberal Party's NBN model.

Measuring the impact of personal style on IM is complex and subject to the interpretation of message recipients.

Data across all sources indicated that 'speeches' were the most common IM practices associated with managing the issue of cost-benefit of the NBN (seven codes). This was followed by presenting before 'parliamentary committees', providing media 'interview/comment', and undertaking 'research', which all had four codes. The use of speeches reflects their prominence in the public sphere and their perceived effectiveness in the eyes of practitioners – speeches are a common means of conveying messages and enhancing salience. Meetings also featured as a way to manage the issue of cost-benefit.

Regarding the CBA, data analysis revealed three instances where IM interventions were perceived to have had a positive impact on public debate, two scenarios where the debate impacted policy, one where IM influenced policy, and another where it caused the retention of a policy (the ALP's FTTP broadband policy at the 2010 election). For this issue, IM practices undertaken 'in person' were the most common (16 codes), then 'media' (nine codes).

Stakeholders had different perspectives on the broader cost-benefit debate, the extent to which they were able to influence it, and how they went about achieving that influence. Adam Lidders, former Communications Manager at IBES, said: 'We are a small research institute, so there's a lot of hats to wear, but we think... [public affairs practices] had a positive influence in the debate and helped talk some sense into broadband policy' (2014, pers. comm., 19 May). In his view, initiatives undertaken by IBES successfully contributed to the debate, infusing it with some research weight.

For IBES, 'research' came up twice in terms of IM practices relating to cost-benefit, 'as part of the first tranche of research projects that were commissioned by IBES, one of them was looking at the cost-benefit analysis' (Lidders 2014, pers. comm., 19 May).

Given IBES' reason to exist was tied to the NBN, it is unsurprising that their position favoured building it – notwithstanding the cost. It is noteworthy that IBES recently changed to the “Melbourne Networked Society Institute” (MNSI).

A common refrain from the Liberal Party was that the NBN could not proceed without a full CBA, putting a ‘question mark around the project’ (Havyatt 2014, pers. comm., 14 April). The ALP put forward a multi-pronged response to the attack on the NBN on the basis of its lacking a CBA.

IBES published a report in 2011, *Valuing Broadband Benefits*, emphasising the social elements of a CBA, which aimed to encourage governments and participants in the debate to consider the broader social consequences as part of a CBA.

IBES focused on benefits across home entertainment and communication, telehealth, e-education, e-government, smart grids, transport, teleworking and cloud computing. The report concluded that ‘a social CBA faces some questions that may be impossible to answer analytically’ (IBES 2011, p. 86). In commenting on the report’s findings, Lidders noted:

And being a very politically sensitive debate that it was, we did release a report on the cost-benefit analysis, but in true, good, issues management style the benefit report said... it’s very hard to quantify, you may as well stick your finger in the air to work out the value [delivered by the NBN], so to speak. (2014, pers. comm., 19 May)

This data also indicated a somewhat sceptical attitude towards the use of IM. Some of IBES' key activities attempted to influence the debate in the public sphere, according to an anonymous IBES interviewee:

Getting out there speaking at events, meetings, workshops, seminars, both our Director and Executive Director were quite active in a range of industry forums such as the *CommsDay* Summits... trying to influence a broad section of stakeholders. (Anon 1 2014, pers. comm.)

Their efforts appear to have been successful in keeping IBES in the debate, and furthering the argument that social benefits are a key outcome of the NBN, and that these are often

inadequately represented in CBAs (if they are represented at all). The following op-ed extract from Rod Tucker, former IBES Director, demonstrates this:

Some opponents of the broadband network have claimed a “cost-benefit analysis” will show it is not financially viable. Like other great nation-building investments, traditional financial cost-benefit analyses miss the point because they do not include the social benefits. If a cost-benefit analysis had been applied to the construction of our rural road network, it would never have been built. (2010)

The interview data, combined with the above purposively selected example, indicates a connection between organisational use of research and messaging: actors in the debate can undertake research which supports or forms the basis of public messaging around a public policy issue.

CBA was a significant overarching issue because it went to the heart of the reason for undertaking the NBN project. IBES’ existence depended upon the project’s viability despite its lack of a CBA, or on any CBA supporting the continuation of the project.

Irrespective of whether the benefits were weighed against the costs, the large cost of the NBN project remained prominent on the public agenda. An extensive media content analysis by IBES examining 30 editorials from *The Australian* (News Corporation) and *The Age* (Fairfax) from 2008–13 indicated that the themes of ‘scrutiny of the NBN business plan’ and ‘the high cost of Labor’s NBN proposal’ dominated the articles (2014, p. 40). Indeed, given the role of the CBA as part of the business case, to attack the credibility of or absence of the CBA is to undermine the NBN business case.

As well as attending meetings, seminars and workshops, IBES employed a “debate shifting” strategy:

Our narrative was around these are the benefits, these are what you can do with it, but we can’t define it as yet. So we were trying to shift the debate away from, “You can’t purely just count some numbers, because you don’t know what those numbers are going to be,” into saying, “How about we think of the potential of what can happen?” (Lodders 2014, pers. comm., 19 May)

Notably, this strategy of attempting to shift the debate came up directly three times across all the data, but was more frequently implied by the description of the practices and organisational approach. It is unclear from the available data how these IBES interventions shifted the debate, if at all.

Other parties to the debate also aimed to highlight the benefits of the NBN, in part as a counterbalance to the significant cost of the project. For example, Daryl Quinlivan, a former DoC Deputy Secretary, said:

At the time the [ALP] government lost office [at the 7 September 2013 federal election] public support for the NBN was still running in the high 50 per cents. So despite the fact that there'd been a campaign against it by large parts of the media and the ascendant opposition strongly opposed it, there was still majority public support for the project, so I think that spoke volumes for how effectively people had grasped the potential benefits. And we played a role in helping them do that. I wouldn't claim sole responsibility, but we certainly played a role in that. (2014, pers. comm., 18 June)

A number of interviewees pointed out that the NBN was the most popular ALP policy going into the 21 August 2010 federal election, and saw this as a partial vindication of their interventions and IM practices in relation managing the CBA issue.

Anon 8 from Telstra perceived a link between public debate and policy outcomes on cost-benefit, noting that speed was seen as the primary benefit of the NBN. The Liberal Party's efforts to emphasise the CBA issue backfired when they issued a new "Letter of Expectations" to nbn before the *Vertigan Review – CBA* had delivered its findings. As noted by Anon 19, a Coalition Adviser, the 'flack Malcolm got when he issued the new Letter of Expectations before the... [*Vertigan Review – CBA*] was supposedly finished was very much a function of him having whipped it up in the first place' (2014, pers. comm.).

The Liberal Party aimed to influence the public debate on CBA by stressing the importance of a CBA to the future of the NBN. The failure of the Labor incumbents to perform a CBA, the public debate, and arguments from individuals within the Liberal Party about CBA merits, affected Liberal policy (Fletcher) – which in turn became public policy. As Fletcher recalled, this all 'contributed to an element of our policy, which was that we

would do a cost-benefit analysis' (2014, pers. comm., 22 August). This was observed across data from ministers and advisers in political parties: public debate influenced the development of party policy, which in turn affected public policy on the NBN (e.g. Fletcher).

In the run-up to successive federal elections, the Labor and Liberal parties, as well as other actors in the debate, attempted to set the media agenda and emphasise the salience of certain NBN issues (McCombs 2014). Both parties sought to frame the issue of the CBA in contrary ways, leaving out specific elements of the issues from the frames. For example, the ALP aimed to frame the NBN issue by emphasising the social benefits, reflected in the IBES research and acknowledged in the interview data – not focusing on the cost component.

Conversely, the Liberal Party aimed to place the significant cost of the NBN, and the lack of a CBA, firmly at the centre of the broader NBN frame. The Liberals' ongoing emphasis on cost, to the exclusion of social benefit, appears to have been more successful than Labor's approach:

Across the coverage of the NBN in *The Australian* and *The Age* newspapers, there were comparatively few articles focusing on the possible, larger societal benefits of the network or the applications that may be supported by the NBN. (IBES 2014, p. 40):

Fletcher and Anon 19 (Liberal Party) stressed the cost aspect of the NBN proposal. Data from ALP interviewees (Anon 21, Conroy, Havyatt) showed an emphasis on the NBN's social benefits, and detracting from the necessity of a CBA.

For the entities advocating the NBN, and for a focus on its social benefits in any CBA, its retention through successive elections and governments (even by Liberal governments that were initially opposed to it) indicates a collective impact on public policy.

The Liberal Party wielded CBA as a 'political weapon to attack the former government' (Anon 6 2014, pers. comm.), using techniques commonly employed in activist IM (Jaques 2014), where an entity will foment an issue and emphasise its salience on the public agenda. Another anonymous interviewee, formerly of nbn, commented: 'Journalists and

tech writers could see a lot of that [CBA] debate for what it was. A lot of it was noise, quite frankly' (Anon 2 2014, pers. comm.).

The initial *NBN Implementation Study* (2010), which was a CBA of sorts, cost approximately \$25 million (Quinlivan). Already having spent this money on this study, the usefulness of a further CBA was questionable – although this point did not permeate public debate.

Other participants also saw the debate on the requirement for a CBA as 'a political exercise' (Anon 6 2014, pers. comm.), viewing the timing of the *Vertigan Review – CBA* as 'arse about' (Anon 6, pers. comm.), because it commenced after the Liberal Party came to power and after the NBN rollout was already well underway, and not likely to be abandoned.

Fletcher reflected the political element of the CBA:

The basic notion that there ought to be a cost-benefit analysis before major public infrastructure projects is a sensible one... So I think we had some success in highlighting that there was this discontinuity, and that it was emblematic of a broader problem, which was that the fibre to the premises policy had been put together in a hell of a hurry rather than being the outcome of a careful deliberative public policy process. (2014, pers. comm., 22 August)

The CBA debate was widely reported in media coverage of the NBN (IBES 2014).

Interviewees suggested bias in reporting, consistently characterising the Fairfax press as being in favour of the NBN and the Murdoch press being opposed. However, the existence of this bias has been contradicted by other data (IBES 2014).

Another perspective on the CBA from a DoC executive whose organisation was embroiled in the public debate reveals a link between the cost, CBA and rollout delay issues:

No modern governments of both colours have been interested in cost-benefit analyses of projects they care about, despite public commitments to the contrary. Since the Alice Springs – Darwin railway, Murray-Darling water reforms and so on, the established pattern is to use these analyses in only the most limited ways and avoid them elsewhere.

The reason *The Australian* and the Coalition were running an argument about a cost-benefit analysis wasn't that they really cared about the decision-making process. It was because they wanted the government to stop implementing this policy and do a cost-benefit analysis, which would take six months or so and effectively delay progress on the project by six months.

That's what they were wanting to achieve, and that's exactly what Conroy and the government didn't want to do, so in some ways it was a completely fake debate, because it was notionally about the right thing to do, whereas the logic for it had nothing to do with that. (Quinlivan 2014, pers. comm., 18 June)

This data suggests that IM practices were being used here to *create debate* for ulterior purposes. On the data it can be speculated that a CBA would have delayed the NBN build further. Any delay could have benefited the opposition Liberal Party at the time, as the NBN was a key ALP policy (DoC 2011).

Data indicates that the Liberal Party used priming throughout its election campaigns to suggest criteria and standards by which the NBN project should be judged. In particular, they stressed the cost of the project, and contended that this should be the measure of success. They downplayed the need for higher bandwidth connections. Their 2013 policy statement set out their position:

But do consumers really need the data transfer rates only fibre can provide, or typically use applications that need such bandwidth? And even if they do, are they willing to pay more for it? Around the world there is no evidence consumers are willing to pay higher charges for 100 megabits per second – and no mainstream applications other than streaming video that utilise such bandwidth. (Liberal Party 2013b, p. 5)

The DoC also played a role in the CBA debate, conveying key messages on the CBA, although the department did not “manage” the issue in the way political parties did (Quinlivan).

Some interviewees expressed the view that performing a CBA would have been of limited use given the complexities of the NBN project (Havyatt, Marshall). Tim Marshall, External Affairs Director at Alcatel-Lucent, noted that ‘a legitimate response to not having a cost-

benefit analysis is that anyone can game a cost-benefit analysis to tell you what it wants to say... it's a bit of a red herring' (2014, pers. comm., 5 June).

It appears that the ALP and nbn's efforts to promote positive elements of the NBN were largely unsuccessful in mainstream newspaper coverage, as the findings of the IBES 2014 report indicate:

Across the coverage of the NBN in *The Australian* and *The Age* newspapers, there are comparatively few articles focusing on the positive aspects and possible larger societal benefits of the network (10 articles or 0.94% of coverage), or on the applications that may be supported by the NBN (including health, arts, education) (12 articles, or 1.13%). (p. 37)

The *Vertigan Review – CBA* aimed to account for the costs and benefits of a range of NBN models, taking the following approach:

A CBA framework is focused on the social welfare of the community. The policy option that delivers the highest *net social welfare* is considered to be the best for society. CBA is designed to take account of the full range of potential benefits and costs of particular actions... It is holistic and designed to include, for example, the environmental, health and economic impacts...

A CBA places each of these impacts on a common basis so that they can be compared and understood... Future impacts are 'converted' into today's terms so that they can be meaningfully compared. (2014c, p. 24, italics in original)

In evaluating the benefits of broadband, the *Vertigan Review – CBA* focuses on existing applications, for example 'e-work, e-health, e-learning, e-commerce, consumer video use and cloud computing' (2014c, p. 80), not considering future technological shifts, such as augmented reality, virtual reality or the internet of things. It assumes that 'most of the benefits included in the analysis were private in nature, except for e-health and e-learning elements' (2014c, p. 81). It makes a number of pessimistic projections about the benefits of broadband:

Evidence suggests that non-private benefits from high-speed broadband, particularly extreme high-speed broadband, are likely to be limited... If there are

few private applications at particular speeds then there are also likely to be few applications with public benefits.

Ubiquity does not bring additional public benefits. For example, it may be argued that if rollout covers 100 per cent of households then the government may be able to shift delivery of services to a more efficient method. In our view this is unlikely to occur in practice. Government service delivery is generally well behind the frontier of what is possible... (Vertigan 2014c, p. 81)

These assumptions are arguably out of step with projected broadband requirements (Vorst et al. 2014), and even with existing practice in Australian jurisdictions: a number of states have already adopted digital and online service delivery practices (for example, ServiceNSW), which prioritise citizen-focused service delivery anywhere, any time. Some of the assumptions made by the *Vertigan Review – CBA* appear to reduce the possibility of all future government service delivery to a non-digital lowest common denominator.

It can be posited that governments could still adopt more efficient, digital service delivery for a large number of citizens who have internet access – while also ensuring they meet the requirements of dwindling numbers of citizens who cannot access the internet.

## 7.2 Building the NBN

Building the NBN, incorporating how to build it and how fast to roll it out, was an unsettled matter for all participants in public debate, whether they had commercial interests in contracts for part of the build, or whether outcomes of nbn decisions about how to build the network would affect their investments. Asbestos and delays with the build were specific sub-issues for Telstra and nbn; these issues could potentially damage organisational reputations, and so required close management.

Data analysis revealed the most common IM practices for the issue of ‘building the NBN’ (separate to specific sub-issues considered here) were ‘providing information’, using an ‘issue database/register’ and ‘working with partners’ (in descending order of code frequency).

One practice that appeared to be under-represented in the data was the use of IM and RM databases by issue managers to keep track of issues affecting their organisations. One

interviewee, Marshall, agreed that he uses IM databases to help track issues related to the NBN build.

Ordinarily these kinds of issues are managed behind the scenes, not in media debate. They are not public policy issues in the same sense as others considered for this study; however, the way in which the NBN is being built, its oversight and rollout speed are questions of public policy. Marshall noted the high-profile nature of all NBN-related build issues, describing the NBN as a 'hot potato' (2014, pers. comm., 5 June) in terms of media interest.

Marshall used 'risk register' and 'issue register' interchangeably, reflecting some blurring of IM and RM in a practitioner context. Marshall described the use of an issue register or database as 'best practice' (2014, pers. comm., 5 June). In adding entries he considered what could go wrong, and how responsibility was apportioned. He commented on the overall IM approach to issues related to the NBN build:

...there are issues that occur across the board, and any technology vendor is going to face the potential for problems related to networks and technology... It would be fair to say that... there would have been one or two minor issues with equipment and systems, and as you would expect we had action plans to deal with that from both technology and stakeholder perspectives.

Certainly with any issue like that, depending on the seriousness, in the NBN domain you would be working with the NBN Co team and possibly the [Communications] Minister's Office to ensure everyone is across the issue and response. (2014, pers. comm., 5 June)

When pressed on his use of strategic planning in IM, Marshall explained how he worked at a high level to help ensure issues did not move onto the public agenda if this would not be in the interests of Alcatel-Lucent:

I've come to the view that as long as you're constantly keeping an eye on what's logically going to come up as an issue, and you've got that in place that you know that the stakeholder piece is really important, there's not a huge amount of other prep you can do. I mean, you could work for days and hours on your Q&As and your

messaging and all of that, but once you've been in the territory for a little while you know where that's going to fall anyway. (2014, pers. comm., 5 June)

This does not reflect the approach described by scholars, who recommend more detailed issues identification, planning and management (Jaques 2014; Palese & Crane 2002b) in their best practice models. Marshall acknowledged that a lack of resources could constrain practitioners' in applying best practice.

A challenge for qualitative studies, including this one, is obtaining accurate descriptions of practices from interviewees, who may undertake IM identification and planning almost on instinct, without thinking through a formalised approach as espoused in IM theory.

On the basis of interview data build issues such as defective equipment could adversely affect organisational reputation, and this would apply for any entity involved in commercial arrangements with nbn to build the network. The management of these issues was paramount, including keeping them out of the public debate about the NBN build.

As Marshall said of all the parties involved in the NBN rollout, 'everyone's got a common interest in there not being an issue' (2014, pers. comm., 5 June). In this environment, issue managers found working closely with partners to be an effective way of managing build issues (Marshall).

Anon 19 from the Liberal Party agreed that disastrous build issues affecting nbn, which ramified in the media, had an impact on Liberal Party policy. Noting ongoing media coverage, Anon 19 said:

So February 2013, March, this was the period where it all just completely unravelled in public... we couldn't keep up with how quickly things were unravelling. So in our policy we had an objective... by 2016 we hoped to get all of the... areas that didn't have access to HFC or good XDSL... we could probably get there if we were doing FTTN. (2014, pers. comm.)

Interview data reflected that the Liberal Party learnt from the ALP's experience with nbn rollout challenges, and adapted its policy positions accordingly. These lessons were highlighted in media reporting of build issues. Difficulty achieving a FTTP rollout in a

reasonable timeframe appears to have influenced Liberal Party policy settings around whether to proceed with an FTTN approach.

### 7.2.1 Asbestos

This issue received media attention when Telstra was publicly accused of exposing workers to dangerous levels of asbestos in NBN “pits”. Some of these pits had not been accessed for many years, and were found to contain asbestos.

The CWU and CEPU, both unions representing communications workers, conducted a public campaign to draw attention to the issue of asbestos in NBN pits. This campaign also highlighted broader build-quality concerns surrounding the NBN, and fed into the debate about Australia’s ageing copper communications infrastructure. Anonymous interview data revealed that the presence of asbestos in pits was well known by industry insiders, but the emergence of this as an issue regarding Telstra’s NBN rollout was potentially created and exacerbated by political interests aiming to manipulate the agenda.

Bill Shorten’s history with the Australian Workers’ Union (AWU) created an incentive for the issue of asbestos in Telstra’s pits to feature prominently in public debate. Data from anonymous interviewees indicated there was a vested interest in raising the issue’s public profile. Shorten employed negative IM techniques to foment public hysteria about asbestos levels, knowing that the fear of disease caused by asbestos is etched into the Australian psyche.

The broader political context behind the issue of asbestos is essential to understanding its management. Anon 15 from nbn noted that:

...people were always going to use the asbestos issue as leverage for claiming increased wages or whatever else they were after from Telstra at the time, and that’s what happened. I think that the asbestos issue was a complete beat up used by people for industrial purposes against Telstra. (2014, pers. comm.)

Data also revealed a view that ‘in the real world there is bloody asbestos everywhere’ (Anon 7 2014, pers. comm.).

Asbestos was a negative issue for nbn, whose initial IM strategy was to avoid asbestos-related media queries, with the approach being to 'refer everything to Telstra. No media interviews' (Anon 14 2014, pers. comm.). But this did not stop nbn from suffering public fallout and brand damage as the asbestos issue progressed in the public sphere (Anon 14). As a result, nbn internal policies were tightened around managing asbestos issues (Anon 14).

The strategy at Telstra was to:

Stop straight away, stop doing all the work. It was apologise, and it was to take responsibility... So not to over promise, but also not to try and shift the responsibility onto the subcontractors. It wasn't a surprise that there was asbestos there... but also being seen to be [taking responsibility], not just putting out a press release. You have to front up. (Anon 8 2014, pers. comm.)

Coding showed that 'providing information' was the primary IM practice in relation to the issue of asbestos (five codes), which included two codes at the child node 'providing reasons, explanation'. Engaging with the media through 'interview, comment' and 'referring elsewhere' were also common IM practices.

Overall, the asbestos issue was damaging to the NBN rollout and nbn. Mike Kaiser, a former Senior Executive at nbn, commented:

It was another issue that was contributing to rollout delays, and so to that extent it became yet another thing that we had to provide information on, yet another thing that we had to explain publicly, yet another thing that we had to justify. (2014, pers. comm., 1 April)

The discovery of asbestos, and subsequent public and media attention, led to a three-month cease work order for nbn (Anon 14). Interviewees described the approach they used to managing the issue, and how this affected the public debate (Havyatt), which also reflects the ALP's approach to many other NBN-related issues:

Our strategies were to appear to be knowledgeable about the issues, to be able to communicate clearly about what was going on with the issues, to be able to express

clearly how there was no risk to the public as a consequence, and to actually just continually radiate calm on the issue. (Havyatt 2014, pers. comm., 14 April)

By this time the issue had moved to the crisis stage. Interview data confirmed scholarship on CM, as responses reflected tactics of ‘disseminating information quickly, accurately, and in a candid manner’ (Howell 2014, p. 192). In providing an explanation to the community:

It was very classic 101, agree with the community’s concerns about the project, explain to them what you’re doing, why you agree with them, and then show them what you’re doing to mitigate the risks so the community gets confident in you. (Havyatt 2014, pers. comm., 14 April)

This response helped reduce the extent of the issue’s damage to the nbn brand, the rollout, and ultimately the Labor Government at the time. In general, Havyatt describes this approach as having been ‘very effective’ (except regarding one location – Penrith), although this interpretation did not align with data from other interviewees (Forman, Kaiser).

‘Referring elsewhere’ was common, as nbn referred asbestos queries to Telstra: nbn ‘took a silent approach on it and we didn’t comment’ (Anon 14 2014, pers. comm.). The public affairs literature describes this as a ‘corporate silence strategy’ (Heugens 2005, p. 494). Anon 14 described the rationale and effectiveness of a silent approach in managing the asbestos issue at nbn:

Telstra was doing a lot of communications around NBN or around... asbestos management at the time, I think it was probably NBN’s best approach to take, because essentially people don’t hear the message you’re giving anyway, so if you do take a silent approach that does work as well...

So as soon as NBN makes a comment, they’re involved in the case. So if we stay out of it, people will associate it more with Telstra... If you stay out of the fire, you won’t be burned. (2014, pers. comm.)

Other interviewees involved in the build, including Marshall, also commented on the use of silence as an IM approach, where the circumstances called for it:

You've got to learn these patterns... and you only learn them over time. It's not rocket science, and there is a bit of instinct involved, and sometimes a need to be subtle. Sometimes the temptation might be there to get out there and proclaim your innocence – and you may very well be innocent – but you may well be better off just letting a little storm cloud drift through over two or three media cycles, keep your head down, and come back in six weeks' time and remind people that you're awesome. (2014, pers. comm., 5 June)

Supervision of contractors and build quality was an ongoing challenge for parties connected to the NBN project. This was evident with the issue of asbestos (Havyatt), but also in terms of overall quality of workmanship (Anon 19).

Havyatt described how SIM, and an anticipatory approach, did not effectively prevent the asbestos issue developing into a crisis for some stakeholders.

It's remarkable how sometimes you make a mistake on an issue, because you sit there saying, "I know asbestos is a problem. You, my contractor, know asbestos is a problem. And we've signed a piece of paper which [reflects that] we both know it's a problem. And you're going to hire somebody else and you're going to tell them it's a problem in the paper that you sign with them."

The last thing you're expecting is some bloke out in the field who's the guy who's actually going to suffer, who doesn't follow the safe handling practices to deal with the asbestos... that's where your mind gets blown away. (2014, pers. comm., 14 April)

A policy outcome from the way the asbestos issue progressed was 'greater supervision for the contractors' (Havyatt 2014, pers. comm., 14 April) from a government perspective, which translated into internal policy changes at nbn and Telstra (Anon 14).

nbn was placed in an invidious position in relation to issues with contractors. As a government-owned entity, it could cause political fallout, and a divergence from the government's position on NBN policy, if it appeared to blame contractors for delays or build quality issues. This also affected the DoC, which aimed to avoid being drawn into debate about nbn's handling of build issues (Quinlivan).

Anon 19, a Coalition Adviser, said in discussing build quality:

People in areas where the NBN fibre network has been rolled out hate the NBN... They absolutely loathe the NBN... Because the NBN is utterly incompetent... The NBN's not a pretty thing in the first place, but some of the installations are just catastrophes... We're actually having to rebuild the whole NBN at the moment. (2014, pers. comm.)

Anon 19's comments reflect a broader antagonism towards nbn in public debate at a political level; the Liberals criticised the NBN extensively over many years, perceiving nbn as a Labor entity. Anon 19 also noted antagonistic relationships under the previous Labor Government: 'they [nbn] had terrible disputes with several of their contractors' (2014, pers. comm.).

Anon 19's politically partisan position as a Coalition Adviser must be considered when reviewing his assessment of NBN contractor supervision issues – in the same way that data from interviewees associated with the ALP must be critically assessed. However, the issue of contractor supervision was evident across the data from ALP and other more independent interviewees.

### 7.2.2 Delay

Ongoing delay with the rollout was a build issue that plagued the NBN for some time. Factors contributing to this delay included lack of skilled staff, project complexity, political and regulatory decision-making at various points during the rollout, and quality issues with the rollout itself (Anon 19). Delays with building the NBN garnered particular traction in the public debate, confirmed by data on the salience of this sub-issue (see **Appendix 12 – Issue salience data**).

The Liberal Party used the delay to criticise their political foes, creating a prime by which the NBN should be judged, and enabling the Liberals to frame the NBN as only capable of being put back on a suitable course using their FTTN model.

'Providing information' (seven codes) was the most common IM practice regarding the issue of delay; 'in person' was the preferred message delivery mode. Three of the seven codes for 'provide information' involved 'provide reasons, explanation'. 'Educating' was the preferred message strategy, as evinced by Anon 14 from nbn:

Corporate Affairs... would pretty much talk to community groups, they'd talk to councillors as well, and just provide a reason as to why there are delays to our schedules and Ready for Service dates as well. So I guess we were open about it. We provided as much information as we could. (2014, pers. comm.)

Interviewees associated with nbn explained their practices in managing the issue of delay, noting they were constrained from using 'frank disclosure of what we believed to be the causes behind' the delays (Anon 15 2014, pers. comm.). Data indicated that on occasion delay issues were the responsibility of contractors, but nbn was politically targeted for them anyway:

We'd outsourced the building of the NBN to construction companies to design and construct the NBN in areas and then roll it out. We had commercial contracts with what we call delivery partners, construction companies, and a lot of our failure to meet rollout targets was as a consequence of them not being able to get their act together and, in effect, comply with the contract.

So we felt quite constrained... So the company wore a lot of blame, which I think in other circumstances could have been easily sheeted home to where it deserved to be. (Anon 15 2014, pers. comm.)

The *Strategic Review* echoed this, noting difficulties obtaining experienced staff: 'The biggest constraint to the network rollout is the availability of network designers, senior and experienced project managers, in-field supervisors and project control staff to provide leadership and oversee program delivery' (nbn 2013, p. 49).

A former Senior Digital Communications Manager from nbn, Scott Rhodie, detailed the approach using social media:

If there was a delay, first off you apologise. I have no qualms with apologising if something's delayed. And a few were saying, "Look, I'm supposed to have it now. It's not here yet." Then I'd try and find out the reasons for it and then get back to them with what was wrong. It was quite time-consuming at times, but I felt that if you're going to be in social media and you're going to be a voice for the company then you need to be the voice which listens.

So I did what I could and I'd go speak to people and get information. I'd get it cleared to make sure it was all right, and then I'd just tell them, by the way, there was a problem with the pits and pipes, or there was a problem with this, but we are working towards it, and there's a new date of this, hopefully so you'll be able to get it soon. (2014, pers. comm., 5 September)

Interview data indicated this IM practice – providing information, and explaining the causes of problems – to be effective (Anon 14). This is circumscribed by broader limitations of qualitative research, in that the specific effectiveness of this practice cannot be disentangled from other influences on stakeholders.

The types of 'in person' practices used for this issue included attendance at 'parliamentary committees' and engagement in 'parliamentary debates'. In both cases, engagement could afford an opportunity for actors in the public debate to convey messages to target audiences and stakeholders.

The Australian media also monitors progress of parliamentary discussions, and policymaking elites in political offices or in government are involved, or are likely to be closely following proceedings directly or via the media.

Specialised journalists in ICT policy fields (including Renai LeMai of *Delimiter*, or *CommsDay* journalists) are likely to report on proceedings, which would further convey messages to the specialised audiences of these ICT trade and media publications.

With regard to broader policy impacts, public debate regarding the delay may have contributed to the establishment of the *Vertigan Review*. Liberal Party policy, which emphasised a faster rollout using the MTM and FTTN, may also have been affected by the incoming government having witnessed how public debate on delay had played out for Labor (Fletcher).

Worsening the communications messaging challenge, nbn was selling a product that many people could not receive for years to come: 'Hardest sell in the world is to sell something that you can't sell them... It's the toughest aspect of selling an NBN' (Rhodie 2014, pers. comm., 5 September).

At the political level, nbn did not engage in the debate on delays, putting it in a difficult strategic position (Rhodie). Delays with the rollout were a persistent line of attack on nbn, but nbn's defences were limited: it could not use traditional IM in the same way an ordinary corporation defends itself in public debate. Rhodie noted:

A lot of days were like ping-pong where you would open up the paper and you would just want to cry... because there'd be a Senate Estimates or Senate Hearings... and the delay would be brought up, and the next thing you know we'd be attacked...

It's a horrible state of affairs, but it was the nature of the beast. The company was, I suppose, created by politicians. It was built on an ideology, and if an opposition has an opposing ideology then that's what happens. We just didn't respond on anything political. (Rhodie 2014, pers. comm., 5 September)

Other interviews also reflected this sentiment (Anon 2, Anon 14, Kaiser). When asked to reflect on the communications aspects of this scenario, one nbn interviewee frankly confided that it was 'a fucking nightmare' (Anon 17 2014, pers. comm.).

### **7.2.3 Choice of technology**

The choice of technology for building the NBN has been an ongoing issue for participants in public debate; choice of technology also directly affects cost. Interview data reflected the view that fibre is generally a more expensive technology, by comparison with copper – at least in the short term.

The Liberal Party's MTM model comprises the use of FTTP, FTTN, HFC, fixed wireless and satellite solutions (Vertigan 2014c). The MTM model uses the existing copper network as part of the FTTN solution (Liberal Party 2014a), which the Liberal Party has argued will be significantly cheaper – although the estimated savings vary in the order of billions.

Of the range of IM practices employed by issue managers to influence public debate, using 'research' to underpin arguments was the most common, spread across 'academic publications', 'journal articles' and 'papers' – with some interviewees also having publications in academic journals. This was expected, given the highly technical nature of the debate about which technology to use.

Participants in the debate generally accepted that in the short term FTTP would be more expensive than FTTN. However, arguments were made in the public sphere about the ongoing cost of maintaining the copper network (LeMay 2012; Ross 2013).

IBES participated in the debate through producing white papers, reports and journal articles, considering the 'level of wireless that should be in the community' (Lodders 2014, pers. comm., 19 May). Throughout this debate the Liberal Party (2013a) aimed to prime the issue of cost as the reference point by which any technology selection should be judged. This was seen in their publications and in interview data. Commenting on how IBES influenced public debate, Lodders noted:

I think it [IBES] provided an authoritative voice in the landscape. So I think one of the beautiful things of being a university and research institute is it can bring a little bit of gravitas to the debate, which hopefully helped demystify some of the quite political issues that were being swung. (2014, pers. comm., 19 May)

However, again, participants found it hard to measure any direct influence on debate or policy. Lodders summarised IBES' influence on the debate:

I think it helped to influence the debate... in terms of outcomes and metrics, I don't know. You produce these things, hope they make an impact, but we don't really have a way of measuring how much impact we have. And also being a research institute, if we didn't make an impact, we're still doing research and getting things out there, so, yeah, not everything can be a winner. (2014, pers. comm., 19 May)

This kind of response to specific questions about how actions influenced debate or policy was common among interviewees.

'Demonstration' was a frequently used IM practice to show the benefits of one technology relative to another. Anon 2 described the use of demonstrations using Kinect for motion sensing, and taking a journalist to see a 'Little hub. It looked like a tiny little broom closet... holds more capacity than [the] whole exchange, which has got thousands of wires. Not only that, but this will serve all of this part of Melbourne... for years to come'. He described the journalist's surprised reaction to the demonstration, suggesting some impact on an anecdotal level.

Interview data reflected the merits of using 'demonstration' to convey messaging in the debate. Demonstrations also afforded opportunities for multimedia such as video and images, which would not be as readily available in a telephone call to background a journalist. Analysis revealed that 'external newsletters' and 'policy/position statements' were also used to influence debate and policy.

A prominent message strategy employed was highlighting 'points of difference' between competing technologies: for example, between FTTP and FTTN. Anon 2, formerly of nbn, emphasised this in his engagement with the media:

The focus... was really on pointing out the major points of difference between fibre and copper, the main benefits from end users' perspectives, some of them novel, such as businesses uploading large amounts of data or of a more serious nature such as people living in remote areas that need medical assistance. (2014, pers. comm.)

An element of the messaging challenge in the technologies debate was the issue of WiFi potentially overtaking wired technologies of all kinds (FTTN, FTTP, HFC, etc.). The Liberal Party pointed to a supposed shift to a wireless communication paradigm: Turnbull brandishing his iPad at every opportunity (Smith 2012). The Liberal Party framed convenience and cost as central elements in the issue of technology choice in the debate, and primed mobility as a standard by which to judge NBN technologies.

Choice of technology ultimately had a significant impact on the evaluation of competing NBN models, to the extent where it effectively determined the outcome of the 2010 federal election. Independent politicians publicly announced as much at the time, and Stanton reflected:

At the end of the day what brought the votes of Tony Windsor and Rob Oakeshott across was a preference for fibre to the home architecture over fibre to the node, which is a fairly extraordinary premise on which a government stands or falls, but it was that choice of technology that won the election for Gillard... there's a very material effect of that choice of technology. (2014, pers. comm., 7 May)

This also underscored the importance of effectively managing this issue for all parties involved in the debate. The voting public and the independents perceived the NBN as ALP

policy; they believed the ALP could manage broadband policy more effectively than the Liberal Party, which caused them to give their votes to the ALP, enabling the ALP to establish a minority government and remain in power.

#### 7.2.4 Aerial deployment

Aerial deployment of cable was a sub-issue that emerged during NBN debates. nbn had to gain access to power poles and other infrastructure to deploy aerial cabling, which is ordinarily controlled by councils; and residents had concerns about the visual amenity of NBN cabling.

According to Kaiser (formerly of nbn):

There was quite a public debate about the aerial deployment of infrastructure as well... A lot of communities, harking back to the days when pay TV cables were rolled out, remembered the very heavy-handed way Telstra and Optus rolled those cables out, causing a lot of community disbenefit.

And in their communities, to get our corporate plan to work it was clear that we were going to have to deploy some cable aerially on power poles. Communities and local authorities reacted against that with quite a public debate about that and we went through a whole process of easing the restrictions around what could be deployed aerially, working with local authorities around the country and with [the] Commonwealth Government to finally land that issue. (2014, pers. comm., 1 April)

In this example, nbn worked closely with partners – local communities – to work around local authority regulations so they were able to deploy aerial cabling. Another way the data shows Kaiser helped to influence the public debate, and subsequently policy outcomes, was through using demonstration and providing information. He organised to address meetings of local authorities across Australian Regional Development Areas (RDAs):

I remember going and talking to a gathering in Canberra of all of those RDAs, heads of all of those RDAs, to talk to them about that issue and many more... just trying to provide information to people. The visual impact of NBN cables is not like the visual impact of pay TV cables. (2014, pers. comm., 1 April)

The visual element was an important component of Kaiser's ability to help influence attitudes and debate on the aerial deployment. He noted:

One interesting aspect to this one was that you could physically show people stuff... So you could always go into the community or public briefings or briefings with politicians or even media briefings with pieces of HFC, which is Pay TV cable which is big and thick, and pieces of our cable so that you could actually physically show people that there would be a different impact to visual amenity. (2014, pers. comm., 1 April)

This echoes the use of demonstration across the data as a practice to help manage public affairs issues in this environment. Although nbn engaged with local councils to influence decision-makers and the debate regarding aerial deployment, having the matter play out in public did not necessarily assist their argument: 'We took the attitude the more that we could sort things out sensibly – which, when it came to the NBN, precluded the media's involvement – the better off we and the project would be' (Kaiser 2014, pers. comm., 1 April).

Kaiser also noted the use of working behind the scenes, directly lobbying and providing information to support nbn's push to deploy NBN fibre aerially. The data and subsequent policy and regulatory outcomes indicate this use of IM practices was successful in achieving changes for nbn, which ultimately supported the project's financial viability (Kaiser). nbn achieved policy and regulatory change with an amendment to the Commonwealth *Telecommunications (Low-Impact Facilities) Determination 1997* (the "LIFD") in favour of aerial deployment.

### **7.2.5 Opt-out, deferral, disconnection**

Managing consent to installation of the NBN was another issue that arose during the rollout. Various NBN policy options were proposed. One option was to install the NBN by default, and then give homeowners the option of "opting-out". Another was to not install by default, and give homeowners the option of "opting-in".

This became an issue because of the need to disconnect telephone services for residents still using the copper network. The communications challenge was ensuring that residents understood the impending copper disconnection dates (Anon 14).

The issue also held the potential for the government to impose a disconnection regime on the industry – which interview data suggested was not in the interests of Telstra, iiNet or the Communications Alliance. Data indicated that interviewees used a range of IM practices and strategies to successfully ward off a government-mandated regime.

It was in nbn's interests to ensure people understood that a disconnection was going to happen in their area (Anon 14). A range of IM techniques influenced public understanding of this issue, and in turn, public debate about the issue in the community.

Information about disconnection was included in Telstra and nbn communications: 'So that's why there's a lot of comms which goes on in areas which are about to be switched off. So they do doorknocks, a lot of marketing materials as well. They do community workshops' (Anon 14 2014, pers. comm.).

Although it is hard to measure an absence or negative, it appears that communications efforts across stakeholders (Telstra, nbn, Communications Alliance) were broadly successful in managing this issue, as ad hoc media analysis over the relevant period showed there was not a high-profile controversy about the disconnection issue – compared to other NBN issues.

Planning communications around the disconnection date (DCD) helped Telstra and nbn manage the issue. Anon 21, a senior interviewee involved in the debate from a practitioner and political perspective, described the IM challenge around the DCD from a carrier perspective:

There's an escalation plan about how you escalate the way that you'll be communicating with these people, from letters, to increasingly urgent letters, to phone calls, to people turning up on their doorstep...

I still think probably 80 per cent of people don't realise this, but when you tell people that NBN means that your phone's going to be switched off, and that you're going to have to make a proactive move to get a new service on the NBN... the eyes boggle a little bit. (2014, pers. comm.)

The issue required careful communications planning. Anon 21 commented on Telstra's approach:

This is one of those comms paths that sort of highlights the old adage that it's not what you say, it's what people hear, and to really be effective in this space you've got to put yourself in the shoes of people who are very, very different to your ordinary stakeholders in the telco sector, putting yourself in the place of say... a vulnerable pensioner who just thinks that this whole issue has got nothing to do with them. (2014, pers. comm.)

This description of the approach taken by a very experienced practitioner demonstrated that organisations' IM practices included forward planning and a focus on what the recipient hears, rather than what the communicator transmits – echoing communications theory (Varey 2001).

All options regarding NBN installation, opt-out and deferral affected the number of people who would be connected to the NBN, the overall cost of the project, and the speed of the rollout. As with many other NBN-related issues, the question of opt-out or deferral was prominent in public debate about the NBN, and so the government needed to make policy decisions in consultation with nbn.

The practice used to manage installation and opt-out was primarily one-to-one communication, via letter, email and phone calls from nbn. This was a messaging challenge, tied to the question of disconnection, as nbn had to draw residents' attention to the proposed changes to their services.

The messaging strategy was to employ simple messaging through IM practices, and to focus on the fact that NBN installation was free, as Anon 14 indicated:

So people had the choice to defer their service or connect. So part of that was a letter was sent out to everyone advising that they would be connected and they had to defer [or] opt-out, otherwise they would be connected to the NBN.

So there were a lot of people that came home and hadn't even read the material, so they hadn't even seen the letter, and they're like, "Oh, I've got a box on my wall. Why is this?" And then I'd have to explain to them that we issued a letter to them and I'd email them the copy of the letter as well just as proof. And I'm just like, "Oh, it's free." What we would really sell is the fact that they don't have to pay for the

connection... And that generally sorted the issue, believe it or not. (2014, pers. comm.)

Some residents appeared not to realise that even if they opted out of NBN installation, the copper network would eventually be switched off – meaning they would lose their phone service. Eighteen months after an area became ‘fully active’ (Anon 14 2014, pers. comm.) with the NBN, the copper network in the area was switched off.

The consequences of opting-out of NBN installation were not ‘communicated that well’ (Anon 14). nbn found that ‘complicated communications’ were a problem for residents, and so marketing communications teams at nbn moved to a focus on keeping messaging ‘simple’ (Anon 14) to enhance effectiveness.

The challenge around the issue of disconnection and opt-out was compounded by the broader debate in the public sphere about the NBN’s merits, and whether the project should proceed in light of its high cost, rollout issues and delay. The broader public debate, in this sense, could have exacerbated the DCD issue. Anon 14 from nbn noted the interaction between NBN issues:

So [residents are] hearing bits and bobs from the media. People’s political views influenced how they felt about the NBN... I often spoke to people who didn’t want to connect, because they didn’t believe in it. Yeah, it’s costing a fortune. And there was one particular case where a guy goes, “You guys are a waste of money.” He goes, “I hope you have a really bad Christmas. Make sure you wish your whole team a bad Christmas for me.” I’m like, “Okay, no worries, thank you, bye.” So there’s a lot of bitterness towards the NBN and spending as well. (2014, pers. comm.)

nbn successfully managed complex build and rollout issues by focusing on simple messaging. This was in an environment of political and media hostility towards the NBN – reflected across interview data and IBES findings (2014).

Complexity around the build, management of partners and the legislative and regulatory environment posed challenges for NBN communications and public affairs teams. One practice was to centrally channel any complaints to one phone line.

So there... [were a lot of] mixed messages going out there as well. Because it is a complex project and there's Telstra involved and there's NBN, there's multiple delivery partners, there's a lot of mixed messaging in the community as well. So it's hard to actually provide a simple message out there.

One way as a community engagement strategy, we just have a Contact Centre where all our complaints come to one central line. It's open Monday to Sunday... so one way we try and do that is send all complaints to the one hotline... And that's effective. (Anon 14 2014, pers. comm.)

This central phone line was also used to channel queries regarding requested deferrals, as well as, for example, other NBN issues such as asbestos (Anon 14). In this regard, being available to communicate with stakeholders, and providing a central communications channel, was reported to assist with the management of issues related to opt-out, deferral and disconnection.

#### **7.2.6 Battery backup**

The background to this issue is that unlike traditional copper network telephones, NBN connections required power to operate. This meant that when premises were switched from traditional copper network phones to NBN fibre, they required a means of maintaining an independent power supply in emergencies. The only way to deliver this was through the use of a "backup battery" installed at the same time as the NBN (Quinlivan).

Interviewees noted that in reality, battery backup was not relevant for many residents: most residents were using mobile phones, which use their own independent battery, or wireless phones, which required power to work and had no backup battery capability anyway. In this regard, a former DoC interviewee observed, 'battery backup was effectively a redundant service' (Quinlivan 2014, pers. comm., 18 June).

This 'horrible issue' (Quinlivan 2014, pers. comm., 18 June) of whether to install battery backup into residents' houses by default arose during the NBN rollout. This would add an additional \$800 million to the NBN cost (Havyatt).

Furthermore, 'many people wouldn't even want it, because they were happy to rely on their mobile phones in an emergency' (Quinlivan 2014, pers. comm., 18 June). Battery

backup issues also posed a high public affairs risk: someone could die if they were not able to use a phone service over the NBN in an emergency, or in a scenario where a medical alarm failed (Kaiser, Quinlivan).

Other interrelated sub-issues of 'battery backup' emerged from the data, including: size and appearance of the battery backup units; their location in people's houses; whether they should be obligatory; whether informed consent should be required if people chose not to have them installed; environmental issues associated with battery disposal; who is responsible for replacing the batteries; who keeps records of who has them installed; and messaging and priority services including medical alarms (Havyatt).

'In person' IM practices were preferred (seven codes) for managing battery backup issues, compared with approaches in the media, mediated one-to-one and mediated one-to-many categories. Of these, entities employed in-person 'briefings' more commonly than other techniques to influence debate.

'Providing information' was a common IM practice (five codes), and 'submissions' was also reflected in two codes. The media's role in reporting on the battery backup issue had some indirect influence on nbn:

So the media's response played up the risks associated with not having compulsory battery backup. Did that influence us? I guess it made us even more determined to get quality information out there... to give the government, I suppose, the room to act in a way which we would argue was more rational. (Kaiser 2014, pers. comm., 1 April)

Battery backup was an issue that participants, particularly the ALP, viewed as better managed outside of the media realm, and addressed 'with lots of conversations with stakeholders' (Havyatt 2014, pers. comm., 14 April). In Havyatt's view, that strategy was effective in managing the issue.

The government's initial position was that battery backup was mandatory, but this ultimately shifted to a view that batteries would be optional. Stakeholders had differing views on whether backup batteries should be opt-in or opt-out.

The DoC preferred installing batteries, being aware of publicly reported scenarios where individuals had died due to lack of emergency communications services in the past (Havyatt). However, the Commonwealth Department of Finance was content with battery backup being opt-in, because not installing batteries could potentially reduce the project cost by \$800 million (Havyatt, Quinlivan). Meanwhile, the debate had a public dimension because many users were unhappy about the batteries' size and physical appearance and resented their installation (Anon 10).

ACCAN supported optional backup battery, and giving consumers the choice. However, ACCAN was also aware of the backup battery's impact on disabled consumers, for whom it was potentially life-saving (Anon 10).

Anon 10, formerly associated with ACCAN, reflected Havyatt's comments regarding the Liberal Party's approach and Kaiser's comments. He indicated the rationale for managing the issue outside of the media:

The reason we didn't want to make it a prominent issue is because we knew that there would just be hysteria if we went out in the media, because there was such an ill-considered and sort of combative and false political football type thing going on that we just wanted to do the work. We wanted to influence NBN Co, influence the department, to make sure things were done right. (2014, pers. comm., 1 April)

Nonetheless, elements of the issue surfaced in the public sphere and in the media.

Rhodie, formerly of nbn, reflected: 'You saw the debate online. You saw the debate in the government. You saw the debate in the newspapers. You saw it everywhere... and then you'd hear customers complaining...' (2014, pers. comm., 5 September).

Conroy believed battery backup should be a must-decide outcome. nbn, industry and retail service providers (RSPs) also disputed who would be responsible for the ongoing maintenance, tracking and replacement of backup batteries, and all the associated costs (Havyatt).

Entities employed IM to try and influence the ultimate policy outcome. ACCAN perceived itself as helping provide people with accurate information on the use of backup batteries, noting communication difficulties with written copy developed by ACMA and nbn (Anon 10).

ACCAN directly influenced the battery backup policy outcome by providing suggested track changes on proposed ACMA boilerplate language, as part of a normal consultative process. Companies would subsequently be required by regulation to include this language in communications material provided to residents about battery backup (Anon 10).

The battery backup issue revealed how internal government stakeholders piggyback off arguments made by other players in the debate to influence fellow agencies. This subtlety is not widely reflected in writing on public policy IM, where the government is often perceived as a single operating interest in the debate – not an entity comprising multiple and potentially incompatible interests.

Havyatt noted that ‘it was the fact that we had the consumer groups saying there had to be a battery available that won us the argument with [the Department of] Finance who literally had got to the point of saying we don’t [need batteries]’ (2014, pers. comm., 14 April).

Questioned about how to measure ACCAN’s contribution to the battery backup debate, Anon 10 said:

It’s very hard to know exactly what effect your specific contribution has in any sort of consultation process where lots of stakeholders have their say. We like to say, when we see an outcome that fits more or less with what we argued, “Oh yeah, we did that,” but then there are always lots of other stakeholders who are saying more or less the same thing, so you never really know to what extent we were the ones that influenced. And I think we do have an influence, but it’s just hard to say exactly in every issue what it is or measure it. (2014, pers. comm.)

In unpacking how entities employed in-person IM practices (including briefings and meetings), mainly involving stakeholder engagement, to influence the course of the battery backup issue, Stanton described the approach taken by Communications Alliance:

I think the more influential part of the strategy was working with the bureaucrats and the ministerial advisers and talking to the minister himself about the merits and the choices and what would constitute a sensible policy...

So, nothing particularly unorthodox, just simply organising your arguments in a sort of rational, coherent, digestible package, and making sure that they get through into the minds of those who can influence the decision. (2014, pers. comm., 7 May)

Kaiser also noted that nbn effectively influenced the debate and policy outcome ‘to a point’, helping soften the government’s position on mandatory backup batteries, and highlighting environmental issues. On their ultimate influence on the debate, and on the respective policy outcome, Kaiser commented:

In my view and in the company’s view [nbn], the government arrived at a much better position following all of the inputs, I suppose, inputs from us behind closed doors, the inputs from telcos who saw the whole scheme as unnecessary as well.

They would have no doubt heard from consumers as well and taken the public debate in the media into account. But, yes, their position changed, in the company’s view, for the better. (nbn 2014, pers. comm., 1 April)

Of all the IM practices nbn employed on this issue, ‘for us the opportunities to do one-on-one briefings with government were always the most influential’ (Kaiser 2014, pers. comm., 1 April). The effectiveness of using one-to-one briefings was seen across interview data. Choosing the most suitable message strategy also helped ensure this worked for the entities prosecuting their arguments about battery backup.

Kaiser’s comments about the government’s decision-making process were supported by interview data from Havyatt, who was working as a Labor political adviser at the time. Telstra also considered it had influenced the policy outcome (Anon 8). Another practitioner commented on how the overall use of IM across all stakeholders and practices ultimately affected the course of the issue, and the government’s policy position on battery backup:

There was just constant back and forth about the implications of various positions, and different media takes on it, different stakeholder takes on it. And, frankly, my recollection with battery backup was that it swung around and around and around for months and months... before landing where it did, but it landed in a very, very different place than it started off in, and I think a large part of that is because of... issues management. (Anon 21 2014, pers. comm.)

The policy debate on battery backup, which took place largely behind the scenes, had a direct impact on the policy outcome. A range of practices influenced this debate (Anon 10, Havyatt, Kaiser, Quinlivan), and their influence, particularly that of Anon 10 (ACCAN), was confirmed by interview data from Conroy in his policymaking role.

The position is currently “must-opt”: consumers of FTTP installations (other than priority medical assistance consumers) must make an informed decision about whether to have a backup battery installed, based on the *Telecommunications (Backup Power and Informed Decisions) Service Provider Determination 2014*.

Havyatt articulated the policy outcome directly: ‘It was a balanced policy outcome, because quite frankly, without the public debate we’d have wound up just putting batteries everywhere’ (2014, pers. comm., 14 April), resulting in widespread inconvenience, negative environmental effects relating to battery disposal, and significant upfront and ongoing costs to the nation.

### **7.2.7 Quigley and Costa Rica**

Former nbn CEO Mike Quigley had previously worked in the US for Alcatel-Lucent, where he had responsibility for the Alcatel-Lucent market in Costa Rica. A breaking issue related to allegations of corruption regarding the market in Costa Rica, of which Quigley contended he had no knowledge.

This created a challenging public affairs scenario, which affected nbn as well as Alcatel-Lucent, Quigley’s former employer. Marshall (Alcatel-Lucent) presented the issue in the following terms:

From a local public affairs point of view, NBN Co was more in the spotlight than we were and given the politics of the day they had a significant issue in front of them with questions being raised, for right or for wrong, about the integrity of the standing CEO of a government-owned entity. (2014, pers. comm., 5 June)

The issue had the potential to negatively affect the NBN rollout. Playing out primarily in the media, it was essentially a media management issue for Alcatel-Lucent. ‘Keeping quiet’ was identified as a key IM practice, as well as ‘issue tracking’ and the development of an ‘issue strategy’.

The issue also curtailed Alcatel-Lucent's media engagement more broadly, as every time they re-engaged with the media, they faced potential questioning regarding the Costa Rica issue. Interview data shows that the issue played into the hands of other actors within the debate – especially the Liberal Party – who sought to paint the NBN as poorly run (Marshall).

Interview data reflected the drain on public affairs resources at Alcatel-Lucent because of this issue:

The amount of time that something like that can take to the external affairs person in an organisation like mine for no end other than keeping a newspaper story running along is quite extraordinary. Now, the alternative is that you don't have anyone doing anything, and the journalists can write what they want, and away it goes, but you've got to be there tracking it, and really, really divert a lot of attention. (Marshall 2014, pers. comm., 5 June)

Having strong relationships with the NBN public affairs and communications team was found to be of 'extremely high value' in helping to manage this issue on behalf of Alcatel-Lucent (Marshall 2014, pers. comm., 5 June). 'Backgrounding' – filling in background details for journalists – was a successful technique for helping to manage this issue. Marshall described his use of backgrounding:

I think we came up with a form of words that made it as clear as possible that there was no evidence of involvement or knowledge on Mike Quigley's behalf. At the same time, I recall being more direct in discussions with journalists about the bullshit being peddled. (2014, pers. comm., 5 June)

## 7.3 Security

The national security implications of the NBN have been an ongoing issue in the public debate, as demonstrated by media content analysis for this study. Research showed that the government has maintained a focus on ongoing protection of underlying communications infrastructure, of which the NBN forms an integral part.

### 7.3.1 Huawei

Huawei is a Chinese company that sought to submit a tender to build part of the NBN. This was an unsettled matter for government, nbn and Huawei, although the outcome

could also affect other organisations involved in the debate. For Huawei, the issue of national security and its participation in the build had significant commercial implications.

From the beginning of Huawei's attempts to be involved in the NBN project, both Liberal and Labor governments pointed to security advice from ASIO that involving Huawei in the NBN would pose an unacceptable national security risk. Even for a Liberal Government keen on reducing the cost of the NBN, the prospect of a Chinese-owned company building the network was ultimately unacceptable.

Issue managers at stakeholder organisations including Huawei, rival bidders such as Telstra, at the DoC, internet advocacy groups, and at the political level all attempted to influence the portrayal of Huawei's political ties. Huawei sought to manage the issue to further its commercial interests, while other bidders and political actors sought to highlight the issue's national security aspect. Other bidders, including infrastructure builder Alcatel-Lucent, could gain from Huawei's exclusion from building the NBN.

On the basis of interview data, management of the Huawei issue is insightful because it highlighted issues of cultural mistrust and xenophobia in Australian electorates, the potential manipulation of these prejudices by political actors through the use of IM techniques, and the protection of Australia's national security. From examining how this issue was managed, an understanding can be developed of IM practices and impacts at the political level, and in an environment of antagonism to some cultural groups or countries.

If NBN policy outcomes relating to this issue were influenced through generating and maintaining false perceptions and stirring mistrust, then serious questions arise about policymaking and implementation at the highest levels – including where national security is involved, and where outcomes and infrastructure delivery choices can lead to significant economic costs for Australia.

Huawei believed the issue indicated a lack of policymaking foresight and accountability, and perceived that the government failed to adequately explain its position on Huawei's ban from being involved in the NBN project (Anon 3). As a component of its IM strategy, Huawei was keen to point to other global networks it has helped build.

Huawei's argument in the public debate (as reflected by interview data and Huawei publications) is that it is building networks in the UK and NZ (Anon 3), and that Australia will miss out on the benefits of utilising the best infrastructure technology in the world due to its opposition to Huawei's involvement. Huawei's strategy remained one of emphasising its value proposition, noting that it could build a network more cheaply than other contenders.

This example demonstrates that IM practices need to be assessed in all the circumstances and context. Immovable countervailing forces may outweigh an issue manager's efforts, even if the issue manager is highly skilled and employs a range of practices (e.g. national security advice and Huawei).

For this issue, 'in person' and 'media' practices were most commonly employed by participants in the debate (both category nodes, with 10 and eight codes respectively). However, the data was dominated by practices employed by Huawei, as other interviewees were reluctant to discuss the issue due to the security component. Some interviewees said they had nothing to say and were not involved, but other data suggested their organisations had been closely involved in the issue.

More specifically, of the 'in person' practices used, the majority were 'meetings', followed by 'facilities tours'. Huawei employed these to show government representatives how Huawei equipment worked: Huawei public affairs advisers arranged tours at facilities in China, and encouraged visits by those involved with policymaking affecting Huawei's interests (Anon 3). Interviewees emphasised that the purpose was to demonstrate transparency in Huawei operations:

We thought they've got to know us better, so we've got to get more people up to headquarters... We said there is an open invitation for anyone to come up and see us. So we were keen to just show that we were open, were transparent, to come and see, just come and kick the tyres... (Anon 3 2014, pers. comm.)

Interviewees noted that they found this strategy to be effective in enhancing understanding of Huawei's operations and approach, which was being done for the greater strategic purpose of influencing decision-makers to support Huawei's involvement in building the NBN.

'Meetings' (five codes) featured prominently:

A lot of behind the scenes meetings, just lots and lots of meetings to see everyone we could, anyone that would speak to us, from senior politicians through to staff members in ministerial offices, to bureaucrats, to agency staff. We just kept going to Canberra to meet as many people as we possibly could to get an understanding of what was going on. (Anon 3 2014, pers. comm.)

Some of the meetings involved bringing Huawei's CEO out to Australia. The meetings were intended to create greater transparency, and for Huawei to project an image in public debate and in the minds of decision-makers and policymakers that it was a trustworthy organisation that should be permitted involvement in constructing this crucial piece of infrastructure.

Despite the many meetings, interviewees suggested the approach was not ultimately successful (Anon 3). This may not have been related to the type of IM practice used or how it was being used, but perhaps more the countervailing forces operating against Huawei, which related political prerogatives of political leaders from both major parties, and undisclosed security advice.

Havyatt noted:

Personally I'd have meetings with Huawei myself and said, "Guys, there's national security grounds. They're real. And if you can't figure them out, go and ask your Chinese parents, they'll tell you." (2014, pers. comm., 14 April)

In terms of media engagement, there were six codes for 'interview, comment', and two for 'talking to a journalist'. Interviewees acknowledged potential damage to the Huawei brand (Anon 3) as a result of being refused involvement in the project, which brought together IM and brand management. When Huawei was banned, the company was criticised in the media and in public debate (Anon).

Huawei employed a former Australian foreign minister and senior Liberal, Alexander Downer, to prosecute its case for involvement with the NBN build. The messaging strategy was to defend the brand and not attack the government (Anon). However, due to an emotionally charged, highly politicised environment, involving a consistently

controversial infrastructure project, maintaining this objectivity became difficult for Huawei's spokespeople.

As debate became more heated, Huawei shifted to avoiding the emotional aspects (Anon). In this sense the Huawei issue – particularly its initial approach – demonstrated how some IM practices can exacerbate a situation, making it harder to attain traction in public debate and with policymakers.

Additional approaches employed by Huawei included global comparisons with other broadband infrastructure Huawei was engaged in rolling out, and an ongoing focus on 'key messages' in communications strategy:

We just kept trying to come back to the information that China was innovating; China was leading the world. Our company was leading the world. We were delivering NBNs around the world. A third of the world's population was using us for their communication needs. We kept trying to come back to just some key messages about our innovation and our leadership... (Anon 3 2014, pers. comm.)

Other parties to the debate focused on key messages around the security of their networks (Anon 4). The government had received adverse security advice about Huawei's involvement with the Chinese Government and its military (Anon 3, Havyatt), and so to shift policymakers in those circumstances would be challenging, even with best practice IM.

The pervasive negativity about Huawei created insurmountable obstacles for their public affairs advisers:

We tried to get the message back to our innovation and our global leadership. To hammer those things and to remind people that we are changing the world of telecommunications. We're the biggest, we're the fastest-growing, and we just had to keep reminding people of that.

But, again, even if they wrote a positive story, they still wrote the two... pars about, "And this is the company that's banned from NBN, the controversial company. Their CEO used to work for the PLA [People's Liberation Army of China]." So those two or

three paragraphs got a run in every single story and they still do today. (Anon 3 2014, pers. comm.)

Other organisations in the debate took the approach of referring queries about Huawei elsewhere (primarily to government agencies). Some organisations were also being supplied with Huawei equipment, and so they were negatively affected by the controversy:

Every time Huawei went back into the press we had to continue to defend our network. So it was a vicious cycle... I've worked for a network vendor; I hate the carriers telling me what to do. So we nicely asked them to, is it necessary, all that kind of stuff, because they have every right to do the strategy that they want.

But we have told them it is unhelpful to us... I didn't know they were going to keep feeding the beast. Every time something came out, you'd go, "Oh surely they're not going to do it again." (Anon 4, 2014, pers. comm.)

Parties opposed to Huawei, or those seeking political mileage from any NBN issues, framed the issue in terms of Huawei posing a national security risk, with the standard of security primed as the way in which the issue should be judged.

Interviewees reflected a view that the manner in which the issue was managed prolonged the media focus on it, and so did not assist in its effective management:

Q: So in terms of the media attention on that issue, did the media attention affect the way the issue developed in the public debate?

A: Oh without a doubt, absolutely. The fact that Huawei kept having to try to defend themselves continued the media cycle, and continued the public debate – beyond what it needed to be. (Anon 4, 2014, pers. comm.)

Others commented on the nexus between intelligence, security and surveillance: 'Telecommunications, in a sense, has always had a very close relationship with diplomacy and national governments and international surveillance, and we're seeing that bear out now' (Anon 21 2014, pers. comm.).

Interviewees indicated that allegations of “Chinese spying” through Huawei equipment needed to be viewed in the context of universal surveillance in international affairs, with the assumption that nations are typically all spying on each other’s networks (Anon).

In a media environment of claims and counterclaims about spying, allegations were made that the US National Security Agency (NSA) had also been implanting spying devices in network equipment (Greenwald 2014).

Interviewees felt that repeating key messages had worsened Huawei’s situation (Anon 3, Anon 4) – which contrasted with data on other issues, where repeated messaging appeared effective (e.g. Anon 19). Huawei’s repeated public denials about government spying were perceived to have affected its brand, which indicates the risks of repetition in defensive messaging: ‘The more we denied the spying allegations, the more people believed them to be true. Unfortunately some of the mud has stuck and we are branded the “controversial company”’ (Anon 3 2014, pers. comm.).

This contrasted with messaging strategy at the political level, used by other interviewees who saw value in repetition:

There’s a principle in politics which is that when you say things for the umpteenth time and you’ve said it so many times that you feel like you want to vomit when you hear it, that’s just the first moment when it’s starting to get into the public’s consciousness. (Anon 19 2014, pers. comm.)

However, when it came to the use of slogans in the public policy debate, discussing ‘the killer line in the [2013] election, “Do you know anybody with the NBN?”’ an anonymous official close to the NBN project cautioned against overuse:

Slogans are brilliant if you can get the right slogan... Because people understand a slogan is a shorthand message for something more complicated, but if you say the slogan so many times that they begin to worry maybe there’s nothing behind the slogan, there’s no slightly more complicated story there at all, it’s just a slogan, it actually becomes self-defeating. (pers. comm.)

## 7.4 Digital divide

The digital divide has been widely theorised in the literature (Bauerlein 2011; O'Hara & Stevens 2006; Servon 2002). It has been argued that there are substantial sociocultural and economic implications of a divide in access to information resources across society.

In broadband policy, the divide refers to differences in internet access and transfer speed. It was an unsettled matter for organisations involved in developing public policy and debating policy settings, including the Liberal and Labor parties, and ACCAN, which represents telecommunications consumers.

The Liberal MTM policy is designed to reduce costs by using a mix of technologies to deliver broadband speeds; not every household receives a fibre optic connection. However, this could create a new digital divide, as some premises have high-speed FTTP access connected under the old ALP regime, and other premises have slower access under the current Liberal MTM model.

Those Australians who received high-speed broadband internet access under the FTTP plan find themselves in a fortunate position. People wanting fibre connections in FTTN areas face prohibitively high prices to arrange their own connections.

Theorists and advocacy groups (e.g. the US-based Alliance for Digital Equality) have posited affordable broadband as essential to helping narrow the digital divide. This analysis is informed by arguments that access to information resources can have substantial sociocultural and economic implications (Bauerlein 2011; Noam 2010; Norris 2001; Novak & Hoffman 1998; O'Hara & Stevens 2006; Rice 2002; Servon 2002).

High-speed broadband has potential applications across education, telemedicine and e-health. It can arguably stimulate the digital economy, and provide access to entertainment services by streaming high definition or 3D video. Users on slower connections may be excluded from these newer services and applications (Vehovar et al. 2006).

The digital divide has been specifically theorised regarding access and use of ICTs (Rice & Katz 2003) – and is often viewed as a divide in access to new ICTs in developed versus developing nations. But the literature identifies many types of digital divide (DiMaggio &

Hargittai 2001; van Dijk 2006), which was also seen in interview data. For O'Hara and Stevens:

It has also become clear that the more important the services that ICT provides, and the more central its role in the lives of citizens, the more important it is in a just society that people get sufficient access to ICT to play their part in the democratic organisation of their society, to be able to achieve their reasonable preferences and pursue their conception of the good, and to avoid their voices being drowned out by the richer and more powerful. (2006, p. 283)

Interviewees acknowledged multiple divides, encompassing 'a number of different demographics, a number of different competencies when it comes to using that technology... It's actually a very big ask to bridge the digital divide because there is no one divide' (Anon 2 2014, pers. comm.).

Types of digital divide emerging from this study and the review of the relevant literature include:

- **Country vs. city** – rural areas traditionally experience poorer internet access in Australia, as providing internet services can be more costly for service providers than providing services in cities (Cava-Ferreruelaa & Alabau-Munoz 2006).
- **Information literate vs. illiterate** – a divide based on understanding of ICTs, and their usage, potentially correlating in some areas with lower socio-economic backgrounds (ACCAN 2013).
- **Older vs. younger** – newer generations are potentially more technology-savvy, and so more likely to take advantage of the high-speed broadband services on offer.
- **Renter vs. homeowner** – homeowners are often more likely to receive broadband than tenants, as tenants receive notification but only homeowners were able to consent to installation during the initial NBN rollout phases (University of Melbourne 2013).
- **Rich vs. poor** – marginalised users, users on low incomes, those from a range of cultural backgrounds (including Indigenous Australians), those with disabilities, or

the homeless may not find broadband access affordable or practical (ACCAN 2013; Cawkell 2000; Dunbar 2012).

- **Fast vs. slow access** – access speed directly contributes to the digital divide in Australia and overseas, especially as minimum speeds will be required to access services conveniently and quickly (OECD 2001, 2011; Oyedemi 2012).

The philosophy underpinning the ALP's NBN policy was of increasing social equity through equal access to high-speed broadband. The aim was to include citizens from lower socio-economic backgrounds, and those in remote areas, for whom providing broadband is not economical for most commercial internet service providers. This approach recognised educational, economic, health and service access opportunities that come with high-speed broadband.

The ideological prerogatives of the Labor and Liberal sides of Australian politics have played out in their relative approaches to building the NBN. Media analysis and interview data reflect that advocates from both major parties have aimed to reframe the digital divide debate.

Whether the FTTP model or the current MTM model is used, some Australian broadband policy commentators in recent analyses are pessimistic that the NBN can address the divide:

...based on the history of broadband development in the more liberal economies of the world, and recognising the way in which capitalism demands instability and uneven distribution of opportunity to fuel its ongoing development, the chances are that the future will continue to be marked by inequitable access regimes and outcomes. (Allen et al. 2014, p. 113)

The way this issue has been primed and framed by various stakeholders has been central to favourable reception of NBN policy by Australian voters; qualitative data confirmed the salience of the issue, and the important role of issue managers in influencing its course on the public agenda.

The goal of redressing multiple digital divides was central to the broader NBN narrative. This emerged in communications about the NBN at political and stakeholder levels, as

parties sought to make the case for building the NBN. Some interviewees felt they were contributing to addressing the divide through their involvement with nbn:

...the digital divide was a problem and part of the public discourse long before NBN Co came along. In fact, building the NBN was the government's policy response to the digital divide... We felt good about the fact that we were building something which would contribute to the elimination of the digital divide. (Kaiser 2014, pers. comm., 1 April)

The Liberal Party's MTM model was recommended by the *Strategic Review* (nbn 2013). Apart from raising interesting questions about nbn reviewing itself, the review recommended that:

...NBN Co selects which technologies will be rolled out on an area-by-area basis, in a way that minimises peak funding and maximises long term economics, while delivering 50 Mbps to a significant proportion (~90 percent) of the fixed line footprint by end of CY19 (covering all areas, both broadbandserved and – underserved).

The technology selection by area takes into account:

- The earliest available technology that provides a certain speed for that area;
- The relative cost position (build Capital Expenditure, ongoing Capital Expenditure and Operating Expenditure) of the various technologies;
- The constructability in relation to neighbouring areas;
- The implications on future revenue realisation; and
- The potential future upgrade path. (p. 15)

The report favoured a flexible approach, using the most readily available technology: 'NBN Co recommends that it develops an optimised multi-technology approach to rolling out the NBN that balances fast deployment of 50 Mbps broadband with better economics, to the highest number of Australians' (nbn 2013, p. 19).

This model does not necessarily prioritise FTTP or fibre connections over other technologies, but instead considers a range of alternative technologies and seeks to connect premises quickly and cheaply at a minimum speed (50 Mbps in most cases).

The MTM model 'gives priority in time to serving areas with poorer current broadband service' (nbn 2013, p. 95). This approach has the potential to help address the digital divide with MTM, but could result in a reasonably ad hoc rollout with varying speeds across the network.

The Liberal Government argues – and interview data partly reflects – that this MTM approach will facilitate faster NBN deployment. But Labor counters with the argument that this may lead to quicker deployment in the short term, but in the longer term, existing non-fibre connections may still require replacement with fibre. This argument, if proven correct, suggests that short-term cost savings in the MTM model will ultimately lead to greater costs as different sections of a patchwork network are upgraded at different times over coming years.

Qualitative content analysis of secondary materials – to contextualise and support findings from interviews – has shown that the ALP and the Liberal Party have included the digital divide in their narrative around the NBN, and have partly framed their respective NBN policy proposals in terms of an ability to address this divide. 'Digital divide' appears in the Liberal Party's NBN policy pronouncement:

To unlock the benefits of the digital economy, access to broadband must be universal, so people in rural or remote areas are not disadvantaged. Broadband must be affordable, so those on lower incomes are not caught on the wrong side of a digital divide.

At present this is not the case. Up to two million Australian households and businesses don't have adequate fixed broadband – they can't access a service or it is too slow and unreliable for basic tasks such as streaming a short video or working from home. (2013, p. 3)

Such was the importance of this issue in the public debate about the NBN that Anon 4 from a major carrier noted that the reality of the digital divide, particularly between the country and the city, had 'led the government to actually have to have a policy' (2014, pers. comm.), and had aided in the NBN project's retention – notwithstanding attacks on its viability (Anon 4 2014).

Interviewees believed their practices had a relatively positive impact on public debate, by comparison with practices in relation to other issues: six codes were recorded against 'digital divide' and 'positive impact on debate'.

Data demonstrated a weighting towards 'in person' IM practices (five codes) and the use of 'research' (six codes). The 'in person' practices were mainly 'events' and 'speeches' (two codes each). Other 'in person' practices reflected in the data regarding digital divide included the use of 'demonstration', 'meetings', 'open days', 'presentations' and 'symposiums'.

The 'research' category of practices was comprised of 'reports' (three codes), 'academic publications', 'papers', using research to 'support partners' and providing 'submissions'. The nature of the public policy issue of digital divide, the types of divide, and how it should best be addressed, arguably lends itself to research as a suitable IM practice to influence the public sphere and policy.

The use of research in framing the issue in the debate, and supporting arguments put forward by partners and allies, is demonstrated in Huawei's approach. Being an international company, Huawei was able to leverage research undertaken overseas in comparable policy settings:

It [*Connecting Communities*] was a document about looking at the digital divide and... how the UK as a model, on how communities had become empowered, had become connected, and how broadband had reduced the digital divide. So we had pushed a document. We had an event in Parliament House in Canberra, and we had an event in Coffs Harbour with the Coffs Harbour Council, pushing our document...

Conroy's office said to me that they loved the document and quoted from it regularly in his speeches, because it was a great summary of how broadband could really empower and improve small communities and small groups. So, digital divide, we definitely pushed that. (Anon 3 2014, pers. comm.)

In this example, Huawei was able to use research, culminating in the *Connecting Communities* report (Williams 2011), to support arguments being made by the Minister for Communications. However, when questioned on the effectiveness of using the research to shift the national debate on the digital divide, which would translate into

specific policy settings for the NBN (e.g. using FTTP), an anonymous Huawei interviewee noted that it may have had some impact, particularly in technical debate, but it did not shift the country.

The use of 'research' here and in relation to other questions raises ethical questions about the manipulation of research and data for specific organisational ends, and how this affects the currency of research in the public sphere, and as an underpinning element of EBP.

*Connecting Communities* includes a set of recommendations for the Commonwealth to adopt to further support proliferating broadband and addressing the digital divide. In IM practice, these recommendations can form the basis for further calls on government to adopt specific approaches that favour the interests of Huawei (or any other infrastructure builder).

The issue of digital divide, and the academic and industry research about its potentially damaging social effects, happened to align with the interests of Huawei, Telstra, Optus, Alcatel-Lucent, and other entities that sought to gain from the building of the NBN. For these participants in the debate, a number of frames to view the NBN could already be overlaid onto existing arguments about the type of NBN that should be rolled out (for instance, FTTP versus FTTN).

'Providing reasons, explanation' was also used to manage digital divide issues. Local councils generally preferred to see FTTP in their wards, and as an nbn interviewee explained:

Blue Mountains City Council wanted more information on why they were left out of the rollout. So we addressed that by putting together a strategy which pretty much provided information on the selection process for why an area was selected in the three-year rollout... So it had to be solid reasoning... We had to provide them with an engineering argument as well. (Anon 14 2014, pers. comm.)

As well as providing reasons and an explanation, providing a 'logical argument on why Blue Mountains was not part of the three-year rollout' (Anon 14 2014, pers. comm.) was found helpful in managing the issue of digital divide in relation to local councils.

nbn provided the community with other analogous examples and comparisons in an effort to explain why the NBN was not rolling out to the Blue Mountains. The strategy was effective in keeping the issue out of the media, 'we had pretty much quelled it' (Anon 14 2014, pers. comm.), so in this sense the debate was more effectively influenced by managing it among specific stakeholder groups.

Interviewees referred to recasting the digital divide issue in terms that aligned with their organisational interests. For example, one carrier 'made it a divide against those who had choice of competition, and those who didn't... so we reframed it' (Anon, pers. comm.).

Overall, interview data indicated that the digital divide issue's development across public debate had a fundamental impact not only on the very existence of the NBN, but also on many of its policy and operational settings, including choice of technology.

When asked whether participation in the debate (through the use of IM practices) had helped to ensure that the NBN project ultimately continued, Kaiser (formerly of nbn) indicated that it 'definitely' had, and that 'The debate around the digital divide affected government policy really fundamentally; it's one of the reasons why they decided to embark on the NBN project' (2014, pers. comm., 1 April).

#### 7.4.1 Country vs city

Interviewees provided examples of how IM practices were used to support the underlying basis for the NBN for rural internet users:

So briefings with rural media, briefings with rural lobby groups, we did a lot of community engagement early on. For a long time there in the beginning we accepted just about every invitation to speak that we could get, because we were very keen to try to establish the argument for the building of the NBN. (Kaiser 2014, pers. comm., 1 April)

Arguably, the digital divide cost the Liberal Party an election, after they lost the support of regional independent senators, who preferred the ALP's NBN model – primarily because of its ability to more consistently address the country/city divide, and to provide a more uniform broadband service across Australia. This was reflected in the Liberal Party's own research and polling (Liberal Party 2010), in interview data, and in media reporting at the time:

The Gillard government is in power today because two regional independents, Tony Windsor and Rob Oakeshott, signed up to redress regional inequality and were promised fast broadband infrastructure...

The divide between bush and city remains and may be getting worse as culture goes digital and the disparity in access, speed and reliability of broadband is what drives regional politicians, such as Windsor and Oakeshott, to take their fateful decisions. (Cunningham & Potts 2011)

The ALP had successfully framed the NBN in terms of addressing inequalities. Ironically, this argument could have been expected from the National Party – part of the Coalition with the Liberal Party – which ordinarily represents rural constituents.

A key node that emerged was ‘neutralising the issue cause’, which means managing the issue by addressing its source and resolving it (where possible). One interviewee believed the underlying FTTP approach could neutralise the digital divide issue in the NBN rollout. Given geographic factors in Australia, including significant distances with a sometimes sparse population density, providing high-speed broadband to rural areas would pose a challenge:

I think the rural/urban thing was the big issue, because there was always the reality that the infrastructure being provided in urban areas was going to be superior to the infrastructure and therefore potentially the service capacity and quality in regional areas. So that was always a problem.

There were a range of available solutions to that at varying levels of cost and complexity, difficulty of execution and so on... And the government did go for a very expensive solution in the end, which was very effective in neutralising the issue, but it also added a lot to the cost of the project. (Quinlivan 2014, pers. comm., 18 June)

The *NBN Implementation Study* (2010) had raised the prospect of increasing the fibre footprint from 90 per cent to 93 per cent of premises in its recommendations, which would have helped remediate the potential digital divide caused by leaving many consumers with slower broadband access.

Overall, former senior executives at nbn perceived the practices and engagement undertaken as having been central to maintaining government policy in favour of a more ubiquitous NBN, with consistent speeds, also reaching rural areas (Kaiser).

Interviewees noted that the rollout, which involved disparate speeds due to the use of different types of technology, was a rich source of issues in need of management. For nbn, the then Labor Government, and the DoC, a key prerogative was keeping these issues out of the media:

Whenever you're working on issues that have national coverage, one of the things you always have to think about is who's going to feel aggrieved about getting a lesser quality service. So it was sort of right from the outset about potential grievances.

The media early on was full of stories from people in regional areas saying, "Oh, the cities will get a fantastic service and we'll just get crap out in the bush, the way we always do." (DoC, Quinlivan 2014, pers. comm., 18 June)

Egalitarian elements of Australian culture may have influenced the public perception of issues around equal access for those in rural Australia, which could have contributed to the NBN's persistent popularity (IBES 2014). This was evident in internal analysis undertaken by the Liberal Party, as they sought to learn from their election loss:

The post election polling confirmed that the NBN was a major reinforcement for people to vote Labor in [the seat of] Bass [in Tasmania]. If we had negated NBN and offered, in a timely way, a decent Tasmanian package, Bass might have been a win instead of a loss. Certainly, Bass and Braddon are seats we must target for the next election... Labor's only real policy advantage was on the NBN. (2010, p. 17)

Anon 4 commented that 'Australians do have an empathy for those who live in the bush... and [citizens] do understand that it is some of their responsibility to actually cross-subsidise, et cetera. So that's why the NBN's been so popular' (2014, pers. comm.).

McCombs points to an electoral effect linked to issue salience, which aligned with electoral support for the ALP on the basis of public views about the NBN: 'issue salience also can be a significant predictor of citizens' actual votes on election day' (2014, p. 106).

Interviewees noted that the focus on building the NBN in rural and regional areas could serve to undermine the argument in favour of the NBN for people in denser areas, such as cities (Havyatt). The Liberal Party was arguing that the government should first focus on city areas that lack adequate broadband:

So it was bizarre. It's sort of like the digital divide was an important issue that in fact we didn't push hard enough and sell hard enough, partly because we were left open to that weakness that says, "But why aren't you building it in the cities where people don't have something today?" (Havyatt 2014, pers. comm., 14 April)

#### **7.4.2 Tenant consent**

An element of the digital divide related to the potential for leased premises to miss out on having the NBN installed, because ordinarily the homeowner had to consent to an NBN installation. If a letter went to the tenants and did not reach the homeowner, or the homeowner chose not to have the NBN installed, tenants could be disproportionately affected, missing out on FTTP connections (particularly under the ALP's rollout model).

Anon 10 (ACCAN) contended that ACCAN was able to place this issue at the centre of the policymaking agenda in the NBN debate. This was in the context of a shift from a "demand drop" – where the NBN was installed according to demand, which required consent, to a "build drop", where houses were connected as the NBN was built down the street.

ACCAN used a range of practices to put this issue on the agenda, including: teleconferences with senior staff from the DoC; raising it repeatedly in meetings with nbn; incorporating it into submissions; presenting to Parliamentary Committees; drafting proposed amendments to regulatory instruments; and sending letters to the DoC, partners and the Minister for Communications 'expressing concern about the potential disadvantage... [and] inequity' (Anon 10 2014, pers. comm.).

Working with partners for third-party advocacy was perceived as especially effective in this example: 'We put it on the agenda. I contacted all the tenants' rights organisations, the tenants' unions. I got them on board to send letters' (Anon 10 2014, pers. comm.).

## 7.5 Regulatory settings

A number of issues arose relating to establishing the right regulatory settings for the NBN, and nbn's monopoly position in relation to the other players in the telecommunications market. **Appendix 16 – All issues list** demonstrates the extensive regulatory sub-issues associated with the NBN rollout, which affect the NBN's ability to deliver on societal, economic and market benefits.

Achieving optimal regulatory settings for the NBN is essential to achieving maximum return on the investment for Australia. Therefore, questions of regulation, although separated out for the purposes of this study, overlap with numerous other issues under discussion.

At the highest level, this is an unsettled matter for all participants in the debate, but particularly for the ACCC, nbn, Telstra, the ALP and the Liberal Party. For most of these entities it has been an external issue; however it is also an internal issue for the ACCC, whose role involves regulating the marketplace in which nbn operates.

### 7.5.1 Structural separation

A key regulatory issue was structural separation of Telstra. This could be regarded as an unsettled matter, a condition and an event, in the sense that the event is structural separation, and secondary research and interview data indicated the wide-ranging impact this would have across Telstra's operations.

For Telstra this was both an internal and external issue, with broader implications for the government, nbn and all Australian citizens. Fletcher from the Liberal Party recounts the issue's genesis:

...the existing regulatory arrangements were not strong enough to prevent Telstra from dominating the industry and suppressing competition, and it was time to seriously explore the structural separation of Telstra. In essence, he [Lindsay Tanner, ALP] argued that the company was simply too big to regulate and it needed to be broken up. (2009, p. 83)

The notion behind structural separation of the largest incumbent telecommunications company in the Australian market was 'a reasonably simple one: Telstra should be split into two companies, one which owns and operates the network and one which sells retail

services' (Fletcher 2009, p. 191). This would create a level playing field for competitors, as a government monopoly would own the underlying physical network layer, and different companies would own the network control and retail layers.

By contrast with the other issues examined for this study, the structural separation of Telstra, and the associated regulatory environment, was one of the most frequently reframed and primed issues by parties to the debate.

David Forman, former Executive Director of the Competitive Carriers Coalition (CCC) – a vocal participant in the debate – noted that 'structural separation was an issue that we were aware of because we put it on the table' (2014, pers. comm., 20 May). The CCC represents most carriers other than Telstra, and perceived Telstra as a dominant, anti-competitive player. They perceived Telstra's customer service as poor, and interview data reflected a belief that Telstra's monopoly was a factor that contributed to this: 'Telstra was enormously powerful, and there was clearly regulatory and policy failure. Consumers were clearly being short-charged in Australia compared to the rest of the world' (Forman 2014, pers. comm., 20 May).

As a greater need emerged for higher-speed broadband, Australian politicians, regulators, consumers and the market were faced with the problem of how the Australian copper network could meet current and future demands for data throughput. In agitating for change, the CCC took the following approach:

What we did was to say to government [was] "Well, the only way that you can fix this is if you break the power of monopoly here because you're going to make a bad situation worse, unless you do, and by the way, this is actually your great opportunity. This is your great opportunity to structurally separate Telstra as you move from one technology to the next." (Forman 2014, pers. comm., 20 May)

The CCC used agenda setting to put the issue of structural separation on the agenda, on behalf of its constituent members, and to further its own strategic goals. Its members were challenger carriers, who stood to benefit from dismantling the existing monopoly.

The CCC also employed issue activist practices to agitate for structural separation, priming the question of regulatory settings in terms of the level of competition and service to customers it could deliver. IM practices were used in combination:

One of the first things that we did to get the issue on the agenda, it was way back in 2004, was we held a policy seminar... We got... a bunch of experts, including some international experts, to come to talk about the regulation of deep fibre networks...

It was in Canberra. We invited people from all the relevant departments, people from relevant ministerial officers and regulators and everybody who we saw had interest in this... It was invitation only. It was private. It was very factual. It was putting a case... we didn't dictate what people said. (Forman 2014, pers. comm., 20 May)

Using triangulation and corroboration, Anon 19 from the Liberal Party confirmed this view: 'So why do we have an NBN? Because the public policy debate and the regulatory debate to some extent was hijacked by a small group of competing carriers' (2014, pers. comm.). Other data indicated that a related policy paper, reflecting the original NBN proposal, was developed subsequently (Conroy).

The CCC employed what they saw to be a 'classic campaigning strategy in a sense of agitate, educate, organise' (Forman 2014, pers. comm., 20 May). They focused on concerns about a Telstra monopoly, and the general appeal of having a level playing field in the telecommunications market. The CCC believed their IM strategy and practices in relation to structural separation were ultimately successful. Forman said:

We persuaded policy makers that there was a problem to be resolved, and that problem could only properly be resolved by structural separation, then the pathway to putting that in play necessarily involved regulatory instruments [the SAU and SSU]... There obviously was a policy response because they structurally separated. (2014, pers. comm., 20 May)

Some bias must be factored into this self-assessment of the IM strategy's effectiveness, given the interviewee was a senior former representative of the CCC – which represents competing carriers. However, data from Forman was largely corroborated by a number of other interviewees.

Across the interviews, issue managers generally appeared honest and frank about the extent to which their work and the IM practices they used were effective; other interviews and secondary materials often corroborated their statements.

Forman commented generally on how IM practices are used to influence the debate, while also facilitating engagement with stakeholders. When seeking to identify the organisations responsible for achieving specific IM outcomes, he commented: 'Most of the time... You want someone else to take the credit. If you're trying to get someone to do something, and you convince him it's a good thing to do, you want them to take the credit, because then they own it' (Forman 2014, pers. comm., 20 May). This contributes to the challenge of measurement, and examining causal links between IM practices and direct influences on public debate, and policy outcomes.

Coded separately, 'structural reform' was also commonly described as an NBN issue during interviews. Arguably structural reform is the parent issue and 'structural separation' is a sub-issue. However, the focus was predominantly on 'structural separation' over 'structural reform' (with 32 versus 16 codes).

For 'structural separation', in-person practices were the most commonly used (six codes), followed by 'media' (three codes) and 'research' (also three codes). Other practices, some being child nodes with two codes, included holding 'seminars', 'media releases', 'providing information' and providing 'submissions'. Messaging strategies included giving 'global comparisons' and 'simplifying complex messages'. Regarding the broader issue of 'structural reform', the use of 'media' IM practices was common (five codes).

Overall, issue managers regarded their interventions on the issue of structural separation as effective in influencing the debate, and as having a real impact on policy outcomes – with the ultimate structural separation of the Telstra, and development of the NBN.

Stephen Dalby, former iiNet Director, echoed the views put forward by other interviewees, including Forman (CCC), Havyatt and Conroy, that IM practices used in the public debate on structural separation and reform significantly contributed to the ultimate policy outcome of separating Telstra, paving the way for the construction of the NBN. Dalby (formerly of iiNet) described the influence in some detail:

I think it's quite genuine that if we hadn't worked with both sides of politics to argue that that structural separation was important, the NBN as it came would never have happened... what we got... was this fibre to the home and a migration path to a technology platform which meant that the copper could be retired, and

once that was retired, owned by Telstra, Telstra no longer owned the access network...

That was an important outcome I think for the industry and for the Australian telecommunications market... I think we could point to that and say, "Yes, we've been a great contributor to that outcome."

So yeah, I think we did and I think Conroy in opposition and then Conroy in government responded to the inputs, the contributions that we made, and the arguments about the benefits that flowed from an improved competitive regime, and I think the evidence in that was that very clear structural separation. (Dalby 2014, pers. comm., 5 February)

Assertions from Forman and Dalby were confirmed by Conroy, in his policymaking role at the time as Minister for Communications:

So they [CCC etc.] have been absolutely influential in creating the atmosphere, the climate, for structural separation for reducing Telstra's control of the sector. They've been absolutely vital.

Without G9 [which included iiNet, Optus], CCC, all of those, constantly putting up arguments about the way Telstra were behaving and how they were holding everybody back... We had some of the slowest, most expensive broadband in the world. We still do... They [CCC] were a constant source of information and support for change in the structure of the industry. (2015, pers. comm., 18 February)

On the issue of 'structural reform', the ACCC provided an insight into how they combine channels for message distribution, but would not ordinarily, for example, use social media to communicate messaging about regulatory decisions. Kristen Hannah, General Manager, Strategic Communications Branch at the ACCC, described their approach:

We've been pretty low-key in terms of taking a position on social media with communications issues. So when we put out a major speech or a release we will tweet that, but we would not be using social media to make public comment. (2014, pers. comm., 17 October)

Hannah was keen to affirm the independence and impartiality of the ACCC. However, another anonymous interviewee from a telecommunications company noted that, in their view at least, the ACCC are not entirely immune from the exigencies of the public debate: 'Influencing [at] the regulator level. Obviously the regulator operates in a broader environment and that can be influenced by things like the media' (pers. comm.).

As discussions unfolded around structural separation and reform, Telstra found itself in a 'highly pressured, highly scrutinised environment', to which it responded by doing 'things in a staged way', letting 'those stages roll out' (Anon 8 2014, pers. comm.).

Telstra melded public policy, commercial, economic and legal issues in negotiating the terms of arrangements with the government for allowing access to Telstra's copper network (Telstra, Anon 8 2014, pers. comm.). The company perceived a need to manage the public policy issues closely, out of the media, and to control information flows for commercial reasons.

...the whole negotiation of the deal [on structural separation] was done behind closed doors with ourselves, the government and NBN Co, and that's where these things were thrashed out. And that's where we tried to keep it, because that was the best place to get it resolved. (Telstra, Anon 8 2014, pers. comm.)

However, Telstra was able to be open about some elements of progress:

We couldn't talk about how the negotiation was going, as in the detail, but we were very clear on what were the drivers that were behind our participation in that negotiation... we tried to paint that broad picture so people can at least see where we're coming from and what we're trying to achieve. (Anon 8 2014, pers. comm.)

Interviewees acknowledged a shift in Telstra's approach to NBN discussions, which came about partly because of the way the previous debate had occurred in the public sphere.

It was very much being honest and upfront and humble... Telstra had a reputation previously of being aggressive with government and regulatory stakeholders... Our relatively new chairman and CEO were measured publicly and that just fitted in with the general approach that we had of trying to be open and upfront about what was going on in our business. (Telstra, Anon 8 2014, pers. comm.)

In response to questioning on this point, Anon 8 agreed:

[There was a] huge reputational repositioning, yeah. We generally had a poor reputation in the public's eye. Not just sort of in a political or regulatory sense, but things like customer service, things like that where some people didn't think highly of us. Some still don't. But very much this focus on getting better at all of those aspects... at the same time. (Telstra 2014, pers. comm.)

These data extracts, as well as the remainder of the interview with Anon 8, demonstrated the value of strategic positioning in the public debate to enhance an organisation's ability to successfully use IM practices. Shifting to a more conciliatory posture in policy issue discussions with government may have resulted in Telstra encountering a more receptive audience when it attempted to convey its messaging around preferred policy outcomes.

Telstra's structural separation was ultimately effected through the lodgement of a Structural Separation Undertaking (SSU) with the ACCC. Notwithstanding the importance of the SSU, which sets out the terms of Telstra's structural separation, Anon 10 from ACCAN notes it 'never really penetrated into the public debate' (2014, pers. comm.). Anon 10 took the view that the SSU, and ultimate structural separation of Telstra, was a specific policy outcome of the way the issue developed in the public debate.

Interviewees representing the organisations central to the debate on structural separation saw definite links between the debate and the regulatory outcome. Marshall, who had direct, high-level involvement in the debate from a number of perspectives and involving a range of IM practices, said of his impact while working with the ALP (before Alcatel-Lucent):

What we did helped set the conditions for that to be a constructive and fruitful discussion [about access and separation] between the government and Telstra... the debate that we pushed helped to reframe the environment to facilitate the discussions that led to the *Definitive Agreements* between Telstra and the government...

Directly it supported the policy outcome of getting the NBN underway... If... [the NBN] was the policy outcome that was being sought, I think that that was directly influenced by that debate, the discussion, the events that took place to lead to that

fruitful and constructive commercial discussion between the government and Telstra. (2014, pers. comm., 5 June)

Segments of the wider community did not appreciate that structural separation underpinned NBN policy: 'structural separation is an issue of acute interest to policy pointy-heads in the telco sector. It's not a mass-market political issue. So it wasn't something that was being hugely focused on by the political journos', instead it would 'play out more... within the industry and amongst... academic commentary on the telco industry' (Fletcher 2014, pers. comm., 22 August).

Nonetheless, the way the debate developed within industry and specialist circles, without Telstra indicating 'there was any fundamental discomfort with our policy direction', was 'one of a number of factors that led... [the Liberal Party] to the ultimate policy position... [it] took to the 2013 election' (Fletcher 2014, pers. comm., 22 August) – a policy that favoured structural separation.

Numerous additional policy impacts flowed from the management of regulatory settings issues. Another interviewee commented on whether IM had led to policy change:

There are thousands of issues [relating to structural separation], just the *Migration Plan* that implemented the structural separation of Telstra, and the migration of customers off the copper fixed line network onto the NBN network, it's hundreds and hundreds of pages long, and it's driven by just an uncountable number of issues, and they a lot of the time are corporate affairs PR type issues.

During the migration is someone allowed to put a backhoe through someone's front garden? What lengths do people go to when they're delivering a drop to a house? Do they do it underground? Do they just string it up in the air? Or if they're doing it underground are they doing tunnelling so that nothing's disturbed on the surface? Myriad... issues flow from that one position. (Anon 21 2014, pers. comm.)

### 7.5.2 Special Access Undertaking

The SAU was lodged by nbn with the ACCC, and it 'sets out the terms that will govern access to the NBN service until 2040, striking a balance between the interests of end-users, access seekers and NBN Co' (nbn 2012, p. 1). Together the SAU and SSU are the

regulatory instruments which effected the structural separation of Telstra and the creation of the NBN (Forman).

Many actors in the public debate made submissions to the ACCC, seeking to modify the NBN SAU. Given the SAU's policy status, any input into it, and subsequent change, is a direct instance of an IM intervention leading to a public policy change on a national level.

In the SAU debate, providing 'submissions' was the leading IM practice (nine codes), and 'in person' practices were also favoured (10 codes). 'In person' practices were largely made up of 'meetings' (nine codes). Meetings were primarily between carriers' representatives and government – DoC, the ACCC and nbn. Using public media channels was not prominently reflected in the data on managing the SAU issue.

The ALP avoided the media in the debate about what to include and the terms of the SAU, acknowledging that ongoing difficulties with the SAU were 'politically damaging' (Havyatt) for the NBN project. Optus and the government under Conroy disputed the terms of the SAU (Havyatt), with Optus rejecting the initial iteration of the SAU.

Conroy, and his office, were unimpressed with the approach taken by Optus and other access seekers to the issue of appropriate terms to be included in the SAU (Havyatt). Naturally there were a large number of further sub-issues relating to specific terms, but for ease of analysis these are referred to collectively here under terms of the SAU.

Interview data described the Labor Government approach to NBN access seekers:

What we said to them was "We understand there's an issue here, but making it go public, dealing with it as a public issue, is not actually helpful, because all you're doing is politicising something which is in fact a commercial dispute"... So we had a good old thump at them on that... We did that as private meetings.

We did not respond [to the media debate], we did not buy into it as a public conversation... Privately we had a chat to people quite frankly to say, "There's a better way for you to handle the issue that's at core here for you." Now, that worked for many of them, but Optus still never quite got there. (Havyatt 2014, pers. comm., 14 April)

Using triangulation and examining management of the SAU issue from a range of perspectives, it appears there was frustration or misunderstanding on the part of some of the access seekers, leading them to employ media channels in an attempt to indirectly pressure government and the regulator to reach more favourable decisions on the SAU.

Access seekers (e.g. iiNet, Telstra and Optus) believed their strategy was successful in influencing the final terms of the SAU. An anonymous interviewee reflected on the outcome of the public IM approach adopted by access seekers in their bid to change the SAU: '50 per cent of that was public pressure' (pers. comm.).

For the Labor Government, this strategy was politically damaging, and their reaction stressed the need to follow appropriate ACCC process (Havyatt). The data shows this ultimately caused access seekers to moderate their IM approach.

When asked about specific indications of the effect of IM practices from a carrier perspective in the SAU debate, an anonymous interviewee reflected on how this causative loop could be closed:

You'd have to have a look at their press releases, but it's clear that it was industry pressure that actually got them to change it [the SAU] several times, but we also told them directly... It's implicit. It's absolutely implicit in the fact that, things that we advocated for, if you read our submissions and then actually look at what was in the document [the SAU], you can see that correlate... it clearly got changed... Our submissions were probably our strongest tool (pers. comm.)

Data indicated that feedback mechanisms sometimes influenced the way IM practices were used from a carrier perspective. An anonymous interviewee noted that 'we did tone down some of our language in our submissions later on because we went pretty hard at the start' (pers. comm.).

A number of access seekers employed submissions as a primary means of contributing to the debate and policy development process for the SAU, and many also sought to influence debate through the industry body, the Communications Alliance. A major telecommunications company believed the use of submissions directly influenced debate, and policy.

I could get out some particular things that we asked for that improved over time, but they were things like more frequent price reviews by the ACCC, less flexibility for NBN Co to introduce new products without them being subject to review, so it was things like that... these things we asked for that we got... there were more.

I think the whole approach, so all the work we put into the regulatory stuff along with the complementary comms media plan, definitely had an impact on the SAU. I think it meant we got a much better outcome than we would have otherwise. (pers. comm.)

The SAU issue also provides an example of how public policy IM necessitates the simplification of complex content for effective communication, as noted by a Telstra interviewee:

The challenge with something like this was you've got an 80-page submission... [and] no one in the general public understands what you're going on about...

So it's really about extracting pieces of information that have some resonance, and so in that sense for the SAU it had to bring it to life for the media, what we were actually talking about, and of course why we thought our arguments were sound... (Anon 8 2014, pers. comm.)

Another set of *Definitive Agreements* had also been negotiated between Telstra, the government and nbn. These complemented the SSU and *Migration Plan* to set out the framework for Telstra's participation in the NBN rollout.

Havyatt described how these were agreed between government and Telstra, largely without awareness on the part of other access carriers such as Optus – which raised some elements of these agreements as policy issues. Negotiating and agreeing these out of the public domain had afforded an opportunity to advance them before they could be revisited and revived as issues requiring management:

None of industry had figured out what was going on until after it happened, but once the deal was done, that was it. Whilst the agreement only became definitive in March 2012, there was no way we were going to go back and revisit it.

So it was actually an interesting piece of how keeping something out of the public domain allowed you to do the policy thing without actually having to respond to the issue. (Havyatt 2014, pers. comm., 14 April)

### 7.5.3 Pricing

Pricing was an issue for a range of NBN stakeholders: for government and nbn, in setting the access price that nbn would charge RSPs; and for ISPs in setting prices for individuals accessing the NBN. It relates to the broader question of the digital divide: because even if the NBN is available, unreasonable pricing could serve to exacerbate the divide.

Data indicated media practices (four codes) made up entirely of media ‘backgrounding’ were used in relation to this issue. Child nodes under ‘message strategy’ relating to ‘content’ and ‘principles’ indicated that messaging on pricing ‘used data’, and was ‘targeted’ with a focus on ‘key messages’ (all three had two codes each).

A fundamental principle underpinning the Labor Government’s NBN philosophy was the notion of “postage stamp pricing”, whereby access charges for the NBN would be the same universally (Anon 2, Kaiser). Anon 2, formerly of nbn, agreed this developed from some of the basic economic arguments and cost-benefit considerations for the NBN:

The price of access to the network from an ISP was exactly the same. So whether they were a big player or a small player it didn’t matter. So they used the term ‘level playing field’ a lot, as did I. (2014, pers. comm.)

There was confusion in the market and in public debate; some ISP representatives were under the incorrect impression that access prices for the NBN would differ. Internode (an ISP) presented itself within the industry debate as the “underdog” and acted somewhat mischievously, having appeared to have taken ‘the commercial decision that they would be better off if they painted themselves as being treated poorly when in fact they weren’t’ (nbn, Anon 2 2014, pers. comm.). This was managed through media backgrounding, and providing journalists with accurate information about wholesale pricing structures (Anon 2).

A particularly effective way of using IM practices to manage this issue was to provide media with direct access to subject matter experts, which is not without its risks. Anon 2 recounted how this affected the course of the issue:

It was one ISP [Internode] that kept making these ridiculous noises, but again, this is where the power of backgrounding comes in. All the tech writers I spoke to and others were made aware very early on. We gave them access to the guy who was in charge of pricing and it just blew them away. (nbn 2014, pers. comm.)

Dalby noted the influence of IM on underlying pricing structures for access to Telstra's network. IM practices reflected in Dalby's interview supported a policy outcome whereby incumbents, such as Telstra, were not able to charge unreasonable prices for access.

In response to a question about whether iiNet's IM interventions had affected policy outcomes or changed regulatory responses, Dalby said, 'I think so. I think because... What's happened is, the regulators haven't allowed Telstra to get away with those sorts of things' (2014, pers. comm., 5 February).

#### **7.5.4 Competition protection**

Fundamental to the viability of the NBN business case was protection from wholesale competition (Kaiser). For example, nbn expressed concerns about the potential for other providers to compete in lucrative urban areas (Havyatt, Kaiser).

Underpinning the NBN business case was the assumption that densely populated city areas would prove more profitable than sparsely populated rural areas, which were more costly for installation: 'we needed some protection against competition so that we could make the money in urban areas to cross-subsidise the bush' (Kaiser 2014, pers. comm., 1 April). The NBN business case could be undermined if competitors could deploy fibre to city areas (Kaiser). Deploying broadband only in densely populated areas using FTTB technology was considered "cherry picking" (Kaiser).

To address these concerns, nbn sought competition protection from the government and the ACCC. This was granted, as both Labor and Liberal parties recognised its importance. Protection from competition was also essential to nbn's ability to charge the same price regardless of where the service was being delivered, which goes to the question of how the NBN would address the digital divide.

Competition protection and cherry picking was on the public agenda in 2014: one carrier, TPG, proposed to provide FTTB by extending its existing network, in competition with nbn (Havyatt). The ACCC (2014) determined that this did not contravene cherry picking

provisions; and this determination had implications for other carriers in the market, who perceived an equal opportunity to compete with nbn (Havyatt). However, the government responded by suggesting they would consider functional separation of other carriers that were competing with nbn at the wholesale level (Turnbull 2014b).

Crafting effective messaging was a challenge for nbn, because it was perceived that asking for protection from competition would be counter-intuitive to politicians and public sentiment, which favoured a competitive market. This was exacerbated by previous experience with Telstra's incumbency and suggestions of competition failure within the market:

It was a corporate plan [for nbn] of some complexity. It contained notions which seemed counterintuitive, like banning competition, for example, in urban areas. That seems like a very radical thing to do until you get the opportunity to explain that it was a necessary reaction to having to deliver what was a very good public benefit of the national uniform wholesale price for broadband services across the country, ending the digital divide. (Kaiser 2014, pers. comm., 1 April)

Data indicated that one-to-one briefings with journalists were effective:

This is not the sort of stuff that you could summarise in a grab and give it to [radio station] 2GB. You had to talk to the more serious economic commentators, the people in the industry who knew what we were trying to achieve, spend a lot of time with them, talking them through the arguments and making them understand and accept that this was a necessary consequence of trying to deliver a good public policy outcome. (Kaiser 2014, pers. comm., 1 April)

Kaiser said this approach resulted in nbn attaining the regulatory protections it needed, demonstrating a successful instance of IM practice leading to a direct policy outcome. In relation to measuring the effectiveness of nbn's IM practices, as with many other examples examined in this study, it is likely that a range of factors contributed to the relevant policy outcome. Some participants in the debate noted that the government was reluctant, at the time, to provide these protections.

That was one of the great debates early on... [it] created quite a bit of tension between the company [nbn] and government, because the government would have

preferred not to have provided those protections against competition. It would have preferred NBN Co to deliver a uniform wholesale price without having to do that, but we were very strenuous in the public arena. (Anon 15 2014, pers. comm.)

Another reportedly successful approach in relation to this issue was the use of ‘third party advocacy’. In the context of TPG’s cherry picking actions, Havyatt described how the practice of third party advocacy was employed:

What is damaging TPG already is the other access seekers saying, “We don’t want that, because you, Mr Customer, if you’re in one of these buildings that TPG is going to wire up, you’ll only be able to buy broadband from TPG...”

So that’s been what we’ve done as a consequence. When people have criticised monopoly, you get the third party advocates to talk about why this is actually a good thing and why consumers will get better competition as a consequence. (ALP 2014, pers. comm., 14 April)

Interview data revealed that other carriers supported nbn receiving competition protections so long as this applied equally to all carriers, and was not going to advantage some individual carriers (such as TPG). TPG’s approach was not to engage, giving it an apparent “maverick” status. This was determined on the basis of broader textual and media analysis, and comments from other interviewees involved in the debate.

Havyatt described TPG, in the context of their approach to the debate, as ‘a very, very strange little ISP’ (2014, pers. comm., 14 April). Stanton, of the Communications Alliance, said: ‘they’re not a company that tends to enter into the public debate very much at all. Almost no one in Australia has met their chief executive’ (2014, pers. comm., 7 May). At the time of writing, TPG has indicated an intention to acquire iiNet (Smith 2015).

Possibly TPG’s focus on not engaging in the debate – presenting a lean, business-oriented posture that eschews engagement in public deliberation, particularly via the media – affords it some strategic advantage by comparison with the other participants. This could mean that when TPG does engage with regulators or government, it can do so in a direct, unfiltered, and authentic manner, which can add weight to its arguments. It is unclear

how effective this approach would be for another carrier, and whether taking this approach provided any strategic differentiation for carriers that adopted it.

Not participating could also make it easier for a carrier to fiercely compete with other carriers, who would otherwise be allies in industry bodies such as the CCC and the Communications Alliance. Some other telecommunications companies, including Dodo and Amcom Limited, take a similar approach to TPG – not significantly engaging in public policy debate (Anon).

### 7.5.5 Black spots

Interview data confirmed that many people living in rural Australia have struggled to obtain good mobile phone coverage (Anon 8, Turnbull 2014a). Areas without reception are referred to as “mobile black spots”. In the NBN context, there are also “broadband black spots” that lack broadband coverage. Interview data confirmed that carriers often find it is not financially viable to build mobile phone towers in remote regional parts of Australia to provide coverage for a small number of residents.

The black spots issue arose in the context of the NBN rollout, with a question over whether infrastructure could be shared and used for mobile broadband. Since the NBN or the carrier was providing connectivity, there was a chance to consolidate and reduce duplication of infrastructure.

To help address the issue, the Liberal Government announced a \$100 million Black Spots Program to subsidise the rollout of mobile phone infrastructure in rural and black spot areas (Turnbull 2014a). A number of carriers engaged in the policy debate on how best to address mobile phone black spots, where there was no viable business case for building towers.

Telstra used a range of IM practices to address the black spots issue, centred on ‘hyper-local community engagement’:

“Why can’t I get coverage?” is definitely front page story at least once a week in regional papers, but at the same time for us it’s trying to demonstrate we understand, that we know. We don’t try and bullshit people. We don’t try and say, “No, no, your coverage is fine.” If there’s a bad spot, we say, “That’s a bad spot.”

We try and be open about investment plans. We're open and say, "There's just not enough people in that particular area, but we'll review it every six months. If you get a business case, we'll listen to you..." (Telstra, Anon 8 2014, pers. comm.)

Data indicated carriers used a range of other IM practices including 'conferences' and 'forums', and messaging was focused on building a 'narrative', and being 'transparent' and 'honest'. An anonymous interviewee from a major telecommunications company provided a detailed account of how these IM practices were used to influence the debate and policy in relation to mobile phone black spots:

[Being able to] talk to these communities... If you ring up any one of them they can tell you the top 10 black spots in their area, and they know which communities, so it's giving them the tools.

And then it's a government relations plan, because these can become big political issues, more than you'd expect, so going out, especially to the regional politicians, and actively engaging with them and walking them through an issue ... Similarly with newspaper editors in those local areas, engaging with them. And then in a policy sense it's more adept, so it's actively engaging with the department [DoC] to look at options...

It's just telling that story [about shared investment], not always in the public, because it's not necessarily interesting enough to be on TV, but just getting that story told in forums, conferences as a demonstration of what can be done. (pers. comm.)

'Narrative' (within 'content', 'message strategy') had eleven codes. Griffin describes the role of narrative in an external IM context:

Another challenge is the *development of policy, positioning or a 'narrative'* on the issue... In many large organizations, it is difficult to find and articulate a common position on an issue that has developed externally and is seen as a threat or potential threat to the organization's interests or ways of working.

It often falls to the corporate affairs function to help broker a position, trial it internally with policy testing and refinement sessions, and advise on whether, how

and when it should be communicated externally... Organizations must also decide their *positioning amongst their peers and competitors*. (2014, p. 45, italics in original)

The data for this study supports Griffin's portrayal of the public affairs practitioner's role here: issue managers frequently described their roles in socialising positions within organisations, seeking input from internal stakeholders when coming to a position, and developing a narrative (Anon 8, Marshall).

Data from anonymous interviewees indicated that a community engagement-centred approach to the issue of black spots, as well as 'in person' engagement and related messaging strategies, was successful in helping to influence government policy on mobile black spots.

When an anonymous interviewee from a major telecommunications company was asked whether there had been an influence on the ultimate policy on black spots through IM practices, he answered: 'I would say absolutely, yes, and policy generally on mobile market intervention' (pers. comm.).

However, potential interviewee bias in favour of effect – as with all interviewees for this study – needs to be factored into assessing this data. When asked what could be measured to support the claims about impact on policy, the anonymous interviewee said:

Only outcomes really... And... policy [on black spots] is one manifestation of it, but it's a longer-term issue. Look at outcomes, the way the mobile market is regulated is vastly different and more friendly to private sector involvement than the way the fixed market is. (pers. comm.)

### **7.5.6 Quality of Service**

The quality of the broadband service provided by nbn was an issue that emerged in the context of broader controversy about the rollout. Quinlivan, formerly of the DoC, described a scenario where nbn offered quality services, but a carrier did not pass on the full service to customers – leading to nbn being criticised in the public debate.

That was a bit of an issue right from the outset... people... might not be receiving the kind of retail products they needed, regardless of the quality of the service at the wholesale level that NBN Co was developing...

The problem was that the retailer had only acquired a very limited capacity and so it was effectively rationing that capacity amongst a larger number of residential users than it should have. So people were buying a high quality service, but the retailer wasn't buying enough capacity to actually provide it. It had nothing to do with the NBN... (2014, pers. comm., 18 June)

Data demonstrated that a number of IM practices were employed (one code each), including providing 'information papers' (ACCC), preparing 'media talking points', 'op-eds', 'providing reasons, explanation', and providing 'submissions'.

Quinlivan described the DoC's approach to managing the Quality of Service (QoS) issue: 'the constant thing was to try and have information that ordinary members of the public could understand to explain the problem; what was being done about it. It was the most effective thing to do' (2014, pers. comm., 18 June).

Quinlivan used media monitoring for environmental scanning to develop an awareness of the QoS issue when it emerged in Tasmania: 'Calls to talkback radio and so on, people complaining... [that] the service quality wasn't what was promised by the government and NBN Co. Yeah, so it got a lot of public attention quickly' (2014, pers. comm., 18 June).

The DoC used IM practices to identify and 'neutralise the underlying issue' (two codes). In Quinlivan's view this technique was effective: 'The problem was to try and get the responsibility assigned to the right party and to get them to fix it' (2014, pers. comm., 18 June). 'Neutralising the underlying issue' was made difficult by the contentious environment in which all the participants in the debate found themselves.

Sometimes it might take a day or two of digging around, not so much by us, but by NBN Co and others to work out what the actual problem was, and then once you knew that you could deal with it.

But I think the greatest difficulty with all these things was that there was such a vitriolic campaign happening against the NBN from... various quarters, that all these

things that were inevitable problems in executing the project, as they became known, they were all just fitted into this frame of reference about the project and the government and so on... (Quinlivan 2014, pers. comm., 18 June)

The management of issues sometimes required a distinct policy response, particularly where the focus was on addressing the underlying issue cause. Developing policy proposals in these circumstances arguably represents a distinct IM practice, reflected in the 'policy, position statement' and 'propose policy solution' nodes.

Quinlivan described the DoC's approach: 'Many of the problems that were revealed did have some real problem with them which required a policy response, sometimes big, sometimes little. It was a constant process' (2014, pers. comm., 18 June).

One frank description of an IM approach that neutralised the underlying problem at a senior political level was based on a 'common colloquialism in politics' – 'if you fuck up, you've got to 'fess up and fix up... You can't fix credibility issues with messaging, frankly. You can only deal with that via actions' (Anon 21 2014, pers. comm.).

According to Quinlivan, the DoC's engagement in the QoS policy debate, particularly with nbn, the ACCC and carriers, helped ameliorate the public affairs damage from the QoS issue. The efforts of issue managers at the DoC and across other stakeholder groups led to a 'policy response' that 'was to assign a contractual responsibility in a commercial sense and to activate the appropriate regulatory response' (Quinlivan 2014, pers. comm., 18 June). This meant nbn subsequently included specific contractual terms covering QoS and backhaul capacity, and the ACCC issued a notice regarding monitoring of retailer performance against their promises and what they were obtaining from nbn.

## 7.7 Content

A number of sub-issues exist in the broad category of NBN content, including which applications require high-speed broadband, and the effect on copyright infringement. In order to justify the cost of building an NBN, proponents aimed to demonstrate applications for the technology.

Research and interview data showed that parties to the debate were affected to greater or lesser extents by policy choices around content issues. The question of what the NBN will be used for is an unsettled matter for participants in the public debate, with the

potential to impact content providers, rights holders, the Labor and Liberal parties, and nbn.

### 7.7.1 Copyright

This study primarily focuses on the content sub-issue of copyright infringement, as creative works are increasingly born in digital formats, and may be easily shared and copied in a way that offline resources cannot be copied.

McKenzie and Walls (2013) note that ‘global music, software, television and film industries claim to be facing the most significant single threat to their profits and very survival in history as a direct result of digital piracy’ (p. 2). While moving to digital provides efficiency and distribution gains, it also increases the ease with which content can be replicated (McKenzie & Wells 2013). This piracy covers a range of works, including ebooks, software, audio and video, as well as future applications.

Rights holders in Australia, represented by the Australian Federation Against Copyright Theft (AFACT), the Australian Content Industry Group (ACIG) and Music Rights Australia (MRA), reflect international arguments that their industries are at risk from copyright theft; two studies in 2011 suggested annual losses of between \$900m and \$1.37b (McKenzie & Wells 2013).

Vanessa Hutley, General Manager of Music Rights Australia (MRA), agreed that piracy has typically been focused on music, movies and software, and it can be done using torrent technology, enabling distributed peer-to-peer file sharing through “seeding”.

Contributing to piracy concerns is the NBN’s potential to facilitate symmetrical (or close to symmetrical) connections – upload and download speeds will be similar, with a move away from high download and low upload speeds. This could result in faster file seeding, and so more widespread copyright infringement.

Not all interviewees agreed that copyright infringement was an NBN policy issue (Fletcher); however others saw them as linked (Dalby, Hutley). Some interviewees noted that copyright infringement is a policy problem regardless of the type of technology. However, Havyatt commented that ‘increasing the size of the pipe potentially increased the size of the problem’ (2014, pers. comm., 14 April).

Issue managers such as Dalby saw copyright as a useful and insightful IM case study, which was supported by secondary materials – so it was included as one of the major issues tracked. Some interviewees were proponents of their organisations’ successful involvement in the copyright debate. iiNet was sued by rights holder representatives and won that case: the Australian High Court unanimously dismissed a rights-holder appeal in a high profile case (*Roadshow Films Pty Ltd & others v iiNet Ltd 2012*).

Dalby described the circumstances of the court case in terms of the public narrative, which painted a “David and Goliath” battle between iiNet and American multinationals:

...the other side was extremely well resourced. We know that because they met with us and told us that. They told us that they had an unlimited budget... They told us they were going to smash us... You might have lots of money, but we’re smarter than you. (2014, pers. comm., 5 February)

Of the IM practices used to influence the course of the copyright issue, ‘in person’ practices were most common (19 codes), followed by ‘media’ practices (15 codes), ‘submission to, into’ (12 codes), ‘mediated 1-many’, (seven codes) and finally ‘research’ (six codes).

Of the ‘in person’ practices, ‘meetings’ account for seven codes, and ‘seminars’ accounted for five codes. Of the ‘media’ practices, the majority were ‘story, story submission, article’ (eight codes), followed by ‘interview, comment’ (four codes).

Of message strategies employed, ‘educate’ was the most common, with fourteen codes. Other message strategies were also employed by issue managers, including ‘addressing misinformation’, ‘charts’, ‘cut-through arguments’, and ‘global comparisons’.

Parties to the copyright debate used research to support their policy arguments and messaging, and this was particularly apparent in data from Hutley (MRA). It was reflected extensively in data on other NBN issues, such as CBA. Hutley (and other interviewees) referred to research, some of which their organisations had commissioned directly or indirectly through partner entities. Hutley noted the importance of research, and its usefulness in attaining media coverage:

We've got research: 71 per cent of Australians think that creators should have their music and creative content respected irrespective of whether being online or in the physical world...

What we do is we have associations through ARIA and APRA AMCOS with international groups who do a lot of research on... [copyright issues]. So the *Digital Music Report* comes out, [to] which we contribute information... and statistics... So industry research on this stuff becomes very important to us... if there's one thing journalists love, it's a data point. (2014, pers. comm., 6 June)

Like regulatory settings, copyright involves numerous legal issues, some of which interrelate and overlap with public affairs issues. The literature notes a tendency for some public affairs issues and policy issues to be viewed purely in legal terms, to the detriment of their successful management – which Jaques calls 'legal response syndrome' (2014, p. 77). Interviewees acknowledged a need for entities engaged in the debate, including iiNet and MRA, to carefully manage perceptions around litigation.

iiNet used the landmark copyright case to its advantage in framing the issue and influencing brand perception with target audiences – including in the investor market. The court case, and ongoing media interest, offered iiNet a chance to promote other brand messages.

During the course of the case which took four years, we were very conscious that if we didn't manage that well, that public perception well, we could lose... We might win in the court and lose... In the court of public opinion. So we designed a strategy to sort of trickle out good news stories as often as we could.

...Slowly just seeding this stuff out on a regular basis, and still answering the questions about the case... We'll get a question in the morning, "Saw the announcement from the other guys and they're saying that you've got caches in your network that are storing all of Disney's content". You can say, no that's not right. We don't cache anything. And by the way we won an award today for blah, blah, blah. And so the media contacts were getting other stories as well.

Yeah, there's this big court case going on. Yeah, we're fighting it. We'll win that. It's not distracting us from the job. As a listed company the share price is sensitive to

market sentiment. So it was important for us to be looking after that market sentiment, and making sure that these good news stories were there all the time... And they might want to ignore them... As long as they've got a story, as long as they can fill their allocation in the column, they don't care what it's about.

And so we were finding a very positive response in the media... It was clearly genuine and honest material. We weren't making things up. But we weren't, in that case, getting in the way. So we took a very structured approach to that and that work filtered back through and we were getting customer feedback that was, "love the way you're dealing with this". "We can see that you guys have got this big case on your hands, but I see the new products were launched last week and we think they're great and that's why we're with iiNet".

And again, some of the public forums like *Delimiter*, like Whirlpool, they were running with the stories themselves. We weren't having to seed those stories. They were just happening by themselves. And that positive vibe exists today really, as a result of that work, so it's been quite sustainable. (Dalby 2014, pers. comm., 5 February)

iiNet's experience was that small stories by themselves would not get covered in the media, but when bundled with others, or tied to bigger issues such as copyright and the court case, they could gain traction.

Some of those good news stories, we just reduced the number of servers by 50 per cent by going virtual or whatever... Nobody's going to run that story... It is a good story. There might be some reduction in costs. There might be some increases in efficiency. But if you've got something else to go with it, you know, there's this, there's that and we've just won this little award over here. You can put four or five small items together, and then it will get a run. Maybe they'll run two of the items, maybe they'll run one. But we consciously scoured the business for good news stories and we had a little pile of them ready to go.

And we employed some people that were quite good at writing copy, that were good at putting a positive spin and extracting as much good news out of small

events that we could. And we consciously seeded that into the market all the time.  
(Dalby 2014, pers. comm., 5 February)

Overall, iiNet found the above approach successful in influencing the debate, strengthening the iiNet brand, and communicating messaging (Dalby). It may even have had an association with an increase in sales:

Because we were putting blogs out as well and posts in Whirlpool and wherever else, letters to the paper. Yeah, that filtered through to the customer and not just the customers but anybody else that was interested in the general public. Our sales continued to go up during that time, so we thought we were on the right track.  
(Dalby 2014, pers. comm., 5 February)

The importance of careful language use in framing the issue was evident in interview data. Hutley, from MRA – a rights holder advocacy organisation – spoke about how language can impact issue perception and issue frames:

That’s why I don’t use the word ‘piracy’ because it immediately brings up these images and you just go, well, I now have to spend another two hours trying to get people to actually stop saying, you know, think of patches over their eyes and boats and stuff. It drives me crazy...

We try and use quite neutral language. I don’t use ‘criminals’. I do categorise certain things as ‘illegal’, but most of the time it’s ‘unlicensed’ ... I try and keep it very sort of generic language. (2014, pers. comm., 6 June)

Data, especially from MRA, demonstrated a tendency for media organisations and commentators to write controversial or attention-seeking stories, based on misrepresentations, which could confuse issues on the public agenda, and worsen the reputation of specific policy proposals and the organisations proposing them.

The Attorney-General announced a proposal regarding the legal mechanism of third-party injunctions to help address infringing behaviour at an Australian Digital Alliance Conference in 2014, and Hutley described what followed:

Within two seconds every speaker and everyone was tweeting about, “The government’s going to filter.” It was... phenomenal. And most of those people were

lawyers and they knew exactly that that wasn't what it was, but they certainly wanted to start having that word and that implication put on this... Within seconds it was, "filtering." I was like, "Come on guys, you know that's not what it is." (2014, pers. comm., 6 June).

Hutley's account reveals how MRA sought to manage the issue and help shift the debate away from a perception that third-party injunctions would amount to government internet content filtering. Hutley wrote an article for an industry publication, *The Music*, which noted the Attorney-General's recognition of the copyright issue. Hutley also distributed the article to MRA stakeholders, and followed up with:

Engaging, talking, talking to departments, using international examples... showing the case law from international examples, proposing ideas based on what's happened internationally, speaking at forums, making people aware of international journals, articles, all that, constantly framing the debate. (2014, pers. comm., 6 June)

Hutley also perceived a need to manage perceptions around discussions with government:

I think one of the biggest challenges in all of this is everybody who has an issue engages with government, and yet that engagement is sometimes characterised in a sinister way, and so it becomes very difficult to have open discussions when you're having the discussions. It's somehow cast as being quite sinister. So those sorts of issues become quite difficult. (2014, pers. comm., 6 June)

Interviewees (especially Havyatt) had a sense that the media would be biased in favour of rights holders, as media outlets are in the content business themselves and their owners have significant intellectual property holdings. However, this was untested, and would arguably be difficult to measure in any event. Havyatt said, 'From a public affairs point of view, you have to be very careful how you frame the content debate in the media because it affects them directly' (2014, pers. comm., 14 April).

Advocacy groups such as the Communications Alliance saw themselves as helping to educate policymakers, for example Attorney-General George Brandis, about the merits of

various policy approaches to addressing the problem of copyright infringement. Stanton described how he used IM practices to influence the debate and related policy:

A ‘gazillion’ speeches, no shortage of press releases and presentations. Myself and Steve Dalby from iiNet have been the two sort of public faces of the debate at this level. I do quite a lot of media work on this.

We’ve worked on the various ministries that have an impact on this. They include Foreign Affairs and Trade, the Attorney-General’s Department, and the Department of Communications. And we’re active in... the policy development core... that will make decisions on this. (2014, pers. comm., 7 May)

The diverse IM practices adopted by the stakeholders in the copyright debate were not always successful, but often had other beneficial consequences, such as in MRA’s case:

So our engagement at a policy level through submissions, events and comms and the meetings that we take, people will ask us to comment on things that go into the press or the press will ask us to comment. So have we changed the policy? No, but are we seen as being part of that discussion? Yes. (Hutley 2014, pers. comm., 6 June)

It is important for a representative body to participate in discussion on topics that directly affect member interests. As well as being influential in the debate, Dalby also perceived iiNet’s approach as effective in affecting policy outcomes: ‘I think we were quite successful in changing and in stopping the tide of “we’ve got to legislate”’ (2014, pers. comm., 5 February).

In addition, iiNet’s active participation in the debate – as well as their legal decision to fight rights holders in what was perceived as a test case with implications across the Australian industry – sent a public affairs signal to federal agencies, notably the Attorney-General’s Department and the DoC, that they were not going to ‘go quietly’ and that ‘if they were to make a decision that was not in our interest... there would be a serious fuss’ (Dalby 2014, pers. comm., 5 February).

Anon 8 from Telstra echoed Dalby’s comments, noting that the carriers’ influence helped to prevent the introduction of a blunt government-mandated regime. The final policy

outcome – the development of a voluntary industry code to tackle piracy – suggests that collective industry IM efforts in relation to the copyright issue ultimately proved successful.

### 7.7.2 Applications

Conroy and nbn also faced the significant issue of how to demonstrate uses for the NBN. In the public sphere, the Liberal Party attacked the Labor NBN plan on the basis that most Australians would not require 100 Mbps speeds (Fletcher). Meanwhile, Conroy's office worked hard to show that existing and future applications would require these speeds, as it was essential to the argument for FTTP.

Labor pointed to high-speed applications including telehealth, teleworking, high-definition video streaming, teleconferencing, enabling the upload of large files (e.g. for local businesses), and educational opportunities (Havyatt). A difficult element of this argument for Labor was promising the development of new applications where often none existed at the time (Havyatt).

Reporting in the popular media on applications for the NBN was lower than might have been expected. In summary findings of media content analysis, IBES found:

Given the transformative potential of high speed broadband for so many aspects of Australian life, it is remarkable that across the coverage of the NBN in *The Australian* and *The Age* newspapers, there are so few articles focusing on the likely applications of the NBN, the implications of these applications for various economic sectors and social groups, and so little debate and discussion of possible economic, societal and cultural benefits of the network. (2014, p. 37)

This was also reflected in interview data: a number of interviewees pointed to a perceived Labor Government failure to sell the benefits of the NBN (Anon 14, Dalby, Stanton).

Notably this effect was evident across both News Corporation and Fairfax publications.

Dalby said:

Sadly, we saw... a lack of selling skills on Labor's side. They were unable to enunciate the benefits. They aren't able to present a convincing case that this infrastructure was an important component for the economy... It's been a gradual

deterioration in understanding what I call the selling or the selling of that idea, the concept, to the population at large. (2014, pers. comm., 14 April)

Interviewees' views on selling the benefits of the NBN were reflected by analysts, including Li (2012).

'In person' practices dominated the data for this issue (17 codes), primarily comprising 'demonstration', 'speeches', and 'launches' in descending order of total codes. 'Research' was prominent, with nine codes, largely comprised of 'reports'. 'Social media' was also indicated in the data for this issue, with LinkedIn, Twitter and YouTube utilised (one code each).

'Demonstration' largely related to demonstrating potential uses of the NBN, such as in the fields of e-health or education. Promotional trucks were used, where 'you could walk in one end and you play with stuff and see broadband experiences' (Kaiser 2014, pers. comm., 1 April). Advertising also featured as an IM practice (three codes). Quinlivan described how this program was used:

There was a digital productivity sort of program and these sort of things that were happening in the department and I was involved in them... they were a bit ancillary to the project, so they were looking at things like better health services, better education services, just trying to promote use. There was a lot of work done on advertising how the NBN would be used. (2014, pers. comm., 18 June)

A senior participant in the debate described how the issue of selling applications for the NBN was a significant public affairs challenge, which also left the NBN open to criticism.

It's always difficult to sell the intangible. Conceptually it's very clear in everyone's mind that, well, the electricity grid was rolled out for street lighting. No one could have possibly conceived of microwaves and computers and televisions and all of that that hung off that transformational technology, but conveying that concept in a way that people could touch and feel, a very abstract concept dealing with transformational infrastructure and utility not being fixed but expanding over time, is very complex...

There was an advertising campaign NBN Co did about a year in that was pretty good in that respect, but the applications that haven't been invented yet, which is the real rationale, is a very difficult sell. (Anon 21 2014, pers. comm.)

IBES was involved in researching and demonstrating uses for the new network, partnering with governments on encouraging innovation and investment, for example through the Victorian Government Broadband-Enabled Innovation Program (Lodders).

On one view, IBES' own existence could be perceived as an IM initiative, in that it could have been created to support the case for the NBN and for the existence of applications requiring high-speed broadband. Lodders noted that 'basically we were set up to help people think about innovative ways to make use of broadband' (IBES 2014, pers. comm., 19 May).

Interviewees perceived tangibility as essential across IM practices: showing journalists uses for the NBN was found to be effective.

A very useful issues management technique is just purely showing people the capabilities. So the technology in a lot of respects is something that once you touch and feel, your mind starts to imagine things you hadn't previously thought of.

So getting journos and stakeholders through the telepresence rooms and things like that, I always thought made a few of the tumblers click into place in people's minds. (Anon 21 2014, pers. comm.)

### **7.7.3 Teleworking**

One application for the NBN was teleworking, which could enable an individual to work from home or from a remote or regional area. IBES undertook research on teleworking with industry partners and the DoC (Anon 1). IBES found this research to be part of successful agenda setting and policy influencing, and it arguably contributed to addressing the NBN applications issue:

So I think that [government investment in telework] did have an impact on policy and that was a way of an organic partnership between different stakeholders, IBES being one, putting this policy agenda on the map, having a big sort of event,

especially in 2012, that was launched by the Prime Minister, coming via telepresence and the minister speaking... (Anon 1 2014, pers. comm.)

Anon 1 described in more detail how IBES' work contributed to government telework policy using additional IM practices, with reference to events in 2012: 'Hosting the launch event of the Telework Week was also a big thing that sort of put it on the map and attracted media interest and attention and made headlines. It got onto the radio and in newspapers' (2014, pers. comm.).

IBES' approach to telework, building on their research, and helping to co-ordinate multiple agendas to progress towards a common goal, demonstrates an effective application of multiple IM practices in conjunction. As demonstrated by IBES' industry engagement on telework, some of the interests in the policy development process are public, while others are less publicly acknowledged.

By delving deeply into each primary NBN policy issue, and their corresponding sub-issues, this chapter has examined how issue managers use IM practices, and in turn, the effects these have on the debate and on policy outcomes. The focus has been on specific examples, and on the interviewees' impressions and perspectives on the relative usefulness of prominent IM practices within the public sphere.

## 8. DISCUSSION

The dataset for this study affords detailed findings on the use of IM – as set out in the two preceding chapters. These findings have implications for the development of NBN policy settings in Australia, and may have broader application to other policy areas.

This chapter discusses the findings of this study in their broader context, considering the role of media bias and social media. It considers how the NBN issues discussed could have been managed in the preceding chapters, in light of IM theory, and it considers IM theory, in light of how the NBN issues were managed. This chapter ends with an assessment of the theory, considering gaps and areas where theory can be improved, and what the findings mean for best practice IM in a public policy context.

In the literature review, the primary writers who systematically and critically examine IM outcomes, based on academically sound research, include Nicholls and Glenny (2005), Oliver and Donnelly (2007), Jaques (2014), and Heath and Palenchar (2007) – with their concept of SIM. Other studies examining the mass media aspect of IM and its effect on agenda setting and policy include Reynolds (1997) and Foster and Howell (2010).

IM consumes a component of the significant resources spent on public affairs activities and practices across the public sphere. Many of these activities are not critically assessed or measured; proponents can only rely on specific case study examples (e.g. **Appendix 1 – IM case study comparisons**), or ‘experiences with blending the right tools’ (Oliver & Donnelly 2007, p. 399).

Interviewees used the media as an additional means of pressuring policymakers (Anon 4, Anon 10). Drawing on research on PR’s impact on the media (Macnamara 2014b), and the media’s ability to set the agenda (McCombs 2014), findings confirm that the media was manipulated on occasion to bring pressure to bear on policymakers (e.g. Optus and the SAU issue). A targeted media analysis of reporting on the NBN corroborated these findings.

Anon 10 from ACCAN said using the media ‘would be... a last resort... if things are going really badly and they haven’t done the right thing and it’s just a mess then you use the media’ (2014, pers. comm.). Activist entities could adapt and use this technique for their own purposes (e.g. major telecommunications carriers Telstra and Optus).

The findings demonstrate that on other occasions issue managers sought to influence policymakers directly. Social media channels allow issue managers and interest groups to publish for themselves, or bring influence to bear, without necessarily dealing with traditional media gatekeepers. Soroka and colleagues see the 'mass media' as a 'policy actor' in its own right:

Media can establish the nature, sources, and consequence of policy issues in ways that fundamentally change not just the attention paid to those issues, but the different types of policy solutions sought...

Mass media are in the unique position of having a regular, marked impact on policy, but from outside the formal political sphere, often without even being recognized as a policy player... media's involvement in the policy process poses some real difficulties. In short, the complexities of policymaking are likely not well-served by well-known tendencies in media coverage. (2013, pp. 204–211)

The NBN debate has seen technology claims and counterclaims: participants used the NBN project's inherent technical complexity to support their arguments or detract from opposing claims. The debate has also seen myriad stakeholders use misinformation to reframe discussion around specific NBN policy elements. Findings in this study bear out comments from Arnold et al.:

The public debate about the NBN in Australia has been fairly reductive and partisan, focused on issues of cost (versus benefits), model of delivery, ownership and control, and ultimately ideological positions about the role of government in internet and service provision. (2014, p. 27)

The use of IM by debate participants could have contributed to its reductive nature, by ensuring that complex policy messages are reduced and simplified to more communicable messaging. However, parts of the media, particularly the technology press, covered the discussion with a greater level of depth and more technical analysis.

Interviewees noted the impact of noise (Shannon & Weaver 1949) in the debate, and the potential for this to interfere with and distort messaging around policy, as part of a broader IM initiative. The data showed an example: in August 2013 Prime Minister Kevin

Rudd made an announcement about Syria and chemical weapons at the NBN Discovery Centre – detracting from planned positive messaging around the NBN (Havyatt).

Notions of encoding and decoding, influenced by semiotics, prove useful in understanding the debate in the public sphere about NBN policy settings. Applying semiotic techniques of encoding and decoding (Hall 1973; Saussure 1983) reveals the use of specific codes in NBN communication. An additional layer of technical knowledge makes it imperative to simplify messaging around the NBN, but is also a potential source of manipulation in the debate.

Despite the technical complexity of communicating messages about the NBN, a range of techniques that successfully influenced the debate emerged from interview data and the findings, including:

- telling a story
- reducing the issue to its simplest elements (Varey 2001), for example communications around the DCD (Anon 10, Anon 14)
- avoiding unnecessary argument with passionate stakeholders – instead shifting the focus elsewhere, and
- focusing on the benefits to consumers (e.g. Anon 14).

## **8.1 Chains of influence**

The findings follow six major issues, demonstrating a number of ways in which issue managers are able to influence debate, and in turn, public policy. Research and commentary on political communication in the public sphere indicates a link between the media, public debate and policy (Nelson 1991; Protess & McCombs 1991), and this was evident in the findings.

This study does not suggest the media agenda, the public agenda and the policymaking agenda are interchangeable – merely that the data considered here demonstrates interrelation and sometimes correlation, based on a complex chain of cause and effect.

Studies that have aimed to create definitive causal links on the basis of media content analysis have been rightfully critiqued: notably, Soroka (1999) considering models by Downs (1991), Baumgartner and Jones (1993) and Howlett (1997).

On some occasions, influencing the debate is seen to be a more effective means to achieve a policy outcome than an issue manager going directly to the policymaker (Anon 4). These chains of influence assist with responding to RQ3, as the media is a key channel through which issue managers aim to influence policy outcomes.

Soroka and colleagues write that ‘media matter, not just at the beginning but throughout the policy process... many of the standard accounts of policymaking have a much too narrow view of the timing of media effect’ (2013, p. 204).

In the literature, public opinion has been considered to influence policymakers, as a key element of democratic representation – although it is a two-way relationship (Hakhverdian 2010). The chains of influence identified in this study are set out in Figure 11 below.

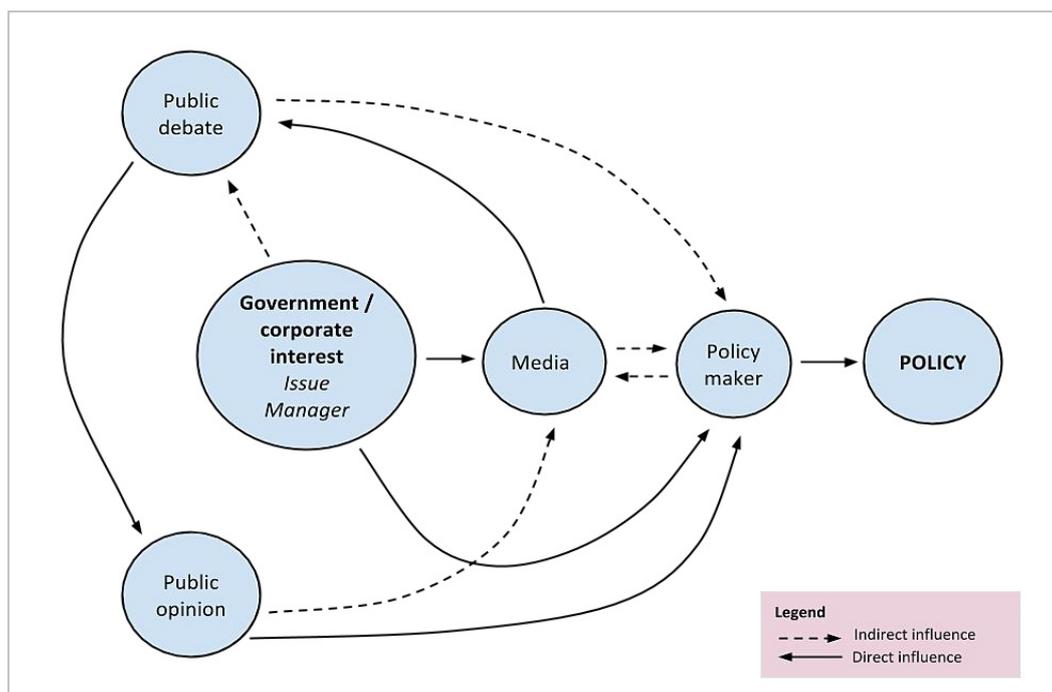


Figure 11. Chains of influence

Dotted lines indicate paths of influence that do not occur directly or as effectively. For example, a journalist or media organisation is unlikely to be in a position to directly influence a policymaker, but can do so via influencing public debate, which in turn can influence public opinion, which can in turn influence a policymaker.

Figure 11 shows how stakeholders who are removed from the process can still influence policy, and some of the paths they may use. Interview data indicated a general reluctance to use the media to put pressure on decision-makers, which was often perceived as a “last resort” (Anon 10). Taking this approach could have an unhelpful effect on relationships with stakeholders (for example, Optus’ use of media pressure).

The points in the chains of influence in Figure 11 mean that an IM intervention is not guaranteed to work; instead, an issue manager can put a signal or message into this system, which may have a greater or lesser likelihood of ultimately influencing a policymaker.

Data from interviewees supports the chains of influence in the above diagram, reflecting findings from secondary research. These influences are also reflected in democratic theory literature on agenda setting, priming and framing: ‘media impart information about policy matters to citizens, who in turn pressure officials to act on their concerns and priorities’ (Protess & McCombs 1991, p. 150).

However, Protess & McCombs acknowledge that determining whether influence occurs in a direct, linear manner remains the subject of debate. The literature includes numerous specific examples of elements of the “chain of influence” above in action – and this study brings them together through the analysis in the preceding chapters.

Many interviewees reflected viewpoints that the two dominant media companies, News Corporation (Murdoch) and Fairfax, took differing views of the NBN: News Corporation opposing it and Fairfax being less negative. An anonymous interviewee noted:

News Corporation in its inimitable way decided that they didn’t like the policy after the 2010 election because it clearly was instrumental in Labor retaining power, and so they began to campaign against it, but in the most bizarre... They basically made up stories about the NBN... In fact, anything that you said about the NBN was reported as being a violent attack on it... Which was just making shit up every day. (Anon 6 2014, pers. comm.)

Quinlivan corroborated this sentiment:

It wasn't as though you could keep ahead of *The Australian* because... if they didn't have a story for the day they would literally just make something up and often the most ludicrous things, but it would be on page three under their NBN Watch heading. So it might become a big issue for a couple of days, even though it had no substance whatsoever. (2014, pers. comm., 18 June)

An IBES study (2014) found no particular agenda in the flagship papers from News Corporation (*The Australian*) and Fairfax (*The Age*). The IBES study (2014) did find a general media bias *against* the NBN, which could reflect media companies and journalists' underlying scepticism towards the NBN because of its potential to further fragment, consolidate and converge traditional media.

The findings of the research do not reveal that the newspapers that we sampled—*The Australian* or *The Age*—are pursuing a particular agenda about the NBN, however the coverage in either newspaper rarely supports a positive view of the network, its success stories, nor its uses.

The analysis of the sample indicates that media sentiment about the NBN is almost always negative with this negativity focusing upon the technical configuration of the NBN, its cost and its management. (p. 41)

This finding supports the view that parties prosecuting the arguments in favour of the NBN and its applications, led by the ALP, nbn and the DoC, largely failed to get media traction on their messaging about the societal, economic and cultural benefits the NBN could achieve.

Interestingly, print media negativity about the NBN contrasted starkly with IBES' findings about the general public's positive attitudes to the NBN. This raises questions about the application of the agenda setting hypotheses: the assumption that the media is able to contribute to issue framing is not borne out consistently here, because public attitudes remained largely positive notwithstanding repeatedly negative issue frames being presented.

Using IBES (2014) data, along with interview data and coding results from this study, media negativity about the NBN, particularly painting the rollout as failing, delayed and incompetent, did not completely undermine the NBN project among the general public. In this instance, the work of issue managers in the Liberal Party aiming to undermine the NBN – through agenda setting, priming and framing using the media or directly – appears to have been unsuccessful.

Findings in this study demonstrate that a significant component of IM work involves managing issues in online and social media environments (Dalby, Rhodie). Social media spaces allow public deliberation and democratic participation, yet are also locations where issues may quickly develop, potentially impacting government agencies or private sector interests.

Questions arise as to the democratic potential of social media spaces, and conversely, the effects of IM on debate in these spheres. Findings support the view that issues develop quickly and spread virally across social media spheres (Coombs 2002).

Traditional IM approaches are challenged by the speed with which issues can develop in the modern public sphere – which was demonstrated by interview data from current and former nbn employees who had involvement with social media IM. Public affairs advisers and issues managers are required to consider how issues may evolve in a mobile environment:

No longer moored to static devices, electronic communication takes on a new, mobile character that undermines the conventional techniques of the practitioner's toolkit, including now-standard online staples such as corporate websites, chat-rooms, email customer response facilities, and electronic news release distribution. It calls for a wider way of thinking about relating to publics. (Galloway 2005, p. 573)

Interview data supports Galloway's analysis (2005) of electronic PR (see **Appendix 23 – Social media IM**). The technology press, like many of the participants and stakeholders in the debate, are inclined to use mobile technologies, and to participate in online chat forums and bulletin boards such as Whirlpool (Dalby).

Some interviewees believed certain social media services did not represent their constituencies, so the approach on occasion was to simply let these issues run their

course. For example, Anon 19, working at the political level, explained his perspective on issues developing on Twitter:

Of course... [social media is] a place where the debate plays out, and of course you keep an eye on it, but you have to be confident enough and balanced enough to understand that it's just a slice... It's a tiny segment...

On social media things blow up into much bigger and much shorter-lived frenzies than in the real world, or the old media world... Those are the only lessons. And don't expect to have a rational debate about anything on Twitter. It doesn't happen, right? Not everyone on Twitter is crazy, but everyone who's crazy is on Twitter. (2014, pers. comm.)

Data indicated the use of social media forums to seed stories, which later appeared elsewhere:

You can use a variety of techniques to get the message out there, including these sensationalist sites that give you an opportunity to correct some misunderstandings, or just to get your ideas and your thoughts out there. So, I do that... It certainly cross-pollinates between the different social platforms. (Dalby 2014, pers. comm., 5 February)

For a more detailed discussion of the use of social media in the NBN debate, see **Appendix 23 – Social media IM**. Although the findings support scholarship on the democratising effects of social media (Lagos, Coopman & Tomhave 2013), effective social media engagement for the execution of an IM campaign can be a costly undertaking, requiring guidance from specialised practitioners or expensive consultants.

An entity in the debate can employ a skilled social media strategist with IM experience to harness IM's potential to influence the course of an issue. Findings also reveal that social media requires constant engagement and monitoring (Dalby, Rhodie).

Environmental scanning on social media demands historical and future data analytics, and it is unlikely an individual or a community organisation would be in a position to access these resources, which can be expensive.

Notwithstanding any democratising effects of social media, government and corporates still access the additional resources that enable them to effectively use IM through social media channels, arguably still placing them in a powerful position in the debate.

The data reflects a lack of representativeness in some online forums (Anon 19), and supports critical commentary on the role of social media in enabling democratic participation. Macnamara finds a lack of substantive engagement with policymaking through social media:

Social media are being used to attempt to breathe new life into and prop up institutionalised politics which is viewed sceptically and even being abandoned by an increasing number of citizens. This appears to be a generalised problem in applying social media to improve political participation...

Social media are seen as spaces for citizens to interact with and through representatives, rather than directly contribute to policy-making or engage in new forms of civic participation. (2012c, p. 11)

Nonetheless, the widespread use of IM to influence social media debate, with a view to affecting policy outcomes, may adversely affect the democratic and deliberative potential of online spheres. Balancing this, social media spaces also can grant activist and NGO groups a cheap publishing platform to reach large audiences – which previously would have been prohibitively costly and difficult.

## **8.2 Assessing IM theory**

This study has shown how IM practices were used to influence the public debate, and how issues moved through the public sphere, developed, and ultimately declined or manifested as crises. Applying IM theory (outlined in the literature review and theoretical framework chapters) to the findings reveals that many of the traditional IM models are useful in understanding how issues develop in a public policy context.

However, no theory examined in this study fully encapsulates how public policy issues develop and how they can be managed. This is due to the uniqueness of each issue, the stakeholders involved, the corporatist nature of many IM models, and the varying objectives of issue managers.

Research and interviews have demonstrated organisations need to adapt their PR practices for their broader ‘social, political and economic contexts’ (Bridges 2004, p. 52), which may support a systems theory approach. This can inform an issue manager’s strategy, including his or her environmental scan and stakeholder analysis.

Bridges posits that ‘each organization is a system of integrated, interdependent parts that is part of a broader tumultuous environment, or macrosystem’ and that an organisation needs to maintain ‘itself in an orderly, nondisruptive state of balance as it responds to environmental change’ (2004, p. 52).

Data suggests this approach is overly limiting, and remaining in an undisrupted state in the modern communications environment – particularly one involving ICT issues, as examined here – is almost impossible. As the system changes, and relationships between components develop, so the organisation should change.

The role of social media in stakeholder engagement (Rhodie) suggests that an organisation, in a communications environment, becomes entangled with its stakeholders, and with communication systems and networks in the public sphere. The fragmented nature of online audiences in the NBN debate supports theory on public sphericles (Macnamara 2012c).

A traditional communications “border” around an organisation, with a conservative and controlling approach to communications management, appears to have been broken down for many participants in the debate; in favour of establishing more accessibility for stakeholders and a more porous communications border – supporting Ghobadi & Clegg’s analysis (2015). Some interviewees saw this as enhancing stakeholder engagement and the effectiveness of IM interventions (Dalby, Rhodie).

Bridges notes that the ‘organization cannot attend to every disruption in its environment and must choose where to put its communication resources’ (2004, p. 53). This is borne out by data in this study, where issue managers often found themselves torn between competing priorities, yet placed in a position where they had to prioritise.

The interview data did not reveal how an organisation could avoid disruption in the charged communications environment of the NBN policy debate, exemplified by criticisms of nbn during the network rollout. The complexity of the policy debate in the public

sphere means that systems theory is of some, but limited, use in understanding an organisation's issues environment.

Legitimacy gap theory affords a way to understand the emergence of issues from an organisational perspective (Sethi 1979), and data on issues and sub-issues tracked for this study supports the application of this theory to public policy issues.

Interviewees did not discuss issues in terms of stakeholder expectations, but equally, the questions in qualitative semi-structured interviews were not specifically about legitimacy or expectation gaps. There was a clear expectation gap on building the NBN, and the sub-issue of asbestos – although on the data, various political interests may have worsened the impact of the asbestos issue (Havyatt). **Appendix 18 – Issue polarity and perspectives** sets out how each entity in the debate perceived each primary issue; often this related to stakeholders' expectations or a legitimacy gap.

In the background of any assessment of NBN policy settings, there is rapidly changing social expectation of the ability to connect to broadband anywhere and anytime, which was evident in examples interviewees provided (Dalby). It follows that entities engaged in the public debate on the NBN need to stay across societal trends and shifts, as 'changing social values can change perceptions of an organization's behavior, and issue managers need to continually be alert to changing stakeholder values' (Bridges 2004, p. 59).

Assessing this theory against the data revealed high expectations of government agencies and government owned entities, such as nbn (Anon 14 from nbn). Because government agencies are expected to act in the public interest, issues such as build delays can have amplified effects on them, and can result in political penalties being imposed on the ministers responsible for those portfolios.

Issue lifecycle theory presents a model of how issues commonly develop in the public sphere (Jaques 2014; Palese & Crane 2002a; Register & Larkin 2008), which was discussed in the literature review. Common lifecycle stage models are outlined at **Appendix 3 – Issue lifecycle comparisons**.

Overall, this study's findings support key elements of the predominant lifecycle models – which themselves share similar stages and characteristics. Sub-issues tracked generally

developed through potential, emerging, current, crisis and dormant stages, as per Figure 1 in Section 2.1.

Sub-issues had potential to develop from an early stage, and interviewees often noted that issues had been “potential” since the inception of the NBN (e.g. digital divide and related sub-issues). The lifecycle models could, however, be updated, for faster news media and social media cycles (Anon 19).

A number of practitioner interviewees did not distinguish between issues and crises, supporting a continuum view of the relationship between issue and crisis stages identified in the literature review; and suggesting that demarcated staged approaches to understanding the transition from an “issue” to a “crisis” are not wholly useful to many practitioners in a public policy IM environment.

Interviewees did not voluntarily refer to individual stages set out in the more detailed models. For example, ‘potential’, ‘current’ and ‘dormant’ stages (Regester & Larkin 2008) were not frequently identified using that language – even in response to specific questioning about what stage the issue was in at a particular time in its development. Many interviewees identified NBN policy issues as beginning in the crisis stage, but beyond that conceptualised them in terms of “issues” as per IM theory in the literature review.

Many IM models include public awareness or media engagement, and these elements propel issues towards the crisis stage (e.g. Regester & Larkin 2008). However, on the dataset in this study, in the field of public policy IM, an issue can develop to crisis point and adversely affect an organisation’s corporate or strategic interests even without widespread media or public involvement. Reputational and public affairs damage can be done to an organisation simply through the impact of an expectation gap on the part of a select group of powerful stakeholders.

Jaques’ 2014 model (Figure 3) includes ‘legislative actions’ and ‘regulation/litigation’. These steps or phases were not always evident in the development of NBN issues. ‘Legislation’ could be omitted from some of the models in their application to a public policy context (reflecting McGregor 1993).

With the issue of security, and the Huawei sub-issue, there was no legislative action that related to the issue for Huawei or the government. In most instances, litigation did not ensue during the 'resolution/decline' stage. For some issues this did occur – such as for iiNet in the case of the copyright sub-issue. Beyond this, the two curves – the 'issue power curve' and the 'issue management curve' – were both extant in the data for a number of sub-issues.

The data, together with experiences of issue managers in the way they use IM practices, supports the view that staged issue models are useful in understanding how issues may progress; they may be instructive in teaching or explaining IM.

Given the range of variables and contextually dependent elements of an issue's development, even on the data for this study with the issues selected, establishing any rigid guides as to how any issue is likely to develop is a fraught process. Nonetheless, the issue stages identified in the literature review were often present on the data for the six main issues tracked.

Some issues in this study were more persistent, or "stickier", than others. The digital divide and its sub-issues persisted for the duration of the NBN debate (and still persist at the time of writing). Bridges (2004), drawing on Hilgartner and Bosk (1988), writes that 'even without resolution, issue life-cycle theory suggests that the issue will eventually lose momentum and other issues will move into the cycle' (p. 63).

The vastly different lengths of the lifecycle – for instance, "sticky" issues such as the digital divide compared to fast turnover social media issues – suggests that linear, sequential lifecycle models are not always suited to the varied courses of public policy issues (supporting critiques by Mahon & Waddock 1992).

The analytical lenses of agenda setting and framing – along with their underpinning theory – have been shown to be useful in explaining, understanding and contextualising the IM practices employed by entities involved in the public debate about the NBN. Interviewees did not specifically refer to priming, although the data showed it was occurring. The findings show that agencies frequently employ agenda setting techniques: the most glaring example emerging from this study was structural separation, and the existence of the NBN itself (Forman).

Given widespread use of digital and online channels, agencies and activist stakeholders have more means available to them for setting the public agenda, and consequently influencing the policy agenda and policymakers.

The potential for issues to develop virally across online platforms, and for them then to be picked up by the traditional offline press (e.g. with Dalby's Whirlpool examples), means that the agenda is more accessible and moves more quickly than it did at the time early theory on agenda setting was being developed. On the evidence gleaned for this study, theoretical definitions espoused by McCombs and Shaw (1972) continue to apply.

This study found that the NBN as a high-level issue rose and fell on the public agenda, and in the public debate. Specific interest groups, for example participants on the technology and ICT forum Whirlpool, would have their attention focused on a number of specific sub-issues, for example CBA or build issues.

This study found that "sub-agendas" exist: more focused interest groups debate a number of sub-issues, all manifesting on the public agenda under the broader umbrella issue of the "NBN". McCombs' model of a 'zero-sum game' (2014, p. 82) agenda does not account for the overlapping issue agendas and diffusion of groups of interest encountered in this study, including policy communities and specific stakeholder groups. In the ICT policy debate the "public agenda" may have become more fractured and diffuse through social media and online discussion.

Framing has also been shown to be a useful theoretical construct to trace the effects of IM in the public sphere. Interviewees frequently referred to framing issues, in the sense outlined by theorists, including Fortunato (2000), Druckman (2001) and Howell (2003). Priming appeared less useful than agenda setting and framing in a public policy environment. Issues for which priming was especially helpful were the CBA question, digital divide and delays with the NBN rollout.

Data indicated that agencies employ varying techniques to manage stakeholder relationships and to successfully implement IM strategies and campaigns. Some organisations, such as iiNet, perceive IM largely through the lens of stakeholder engagement.

The findings partly bear out powerful stakeholder theory (Grunig & Reper 1992; Heath 2009; Nasi et al. 1997), which underpins elements of IM. The findings support overlapping political power theory, as carriers have used their power to facilitate influence (Lukes 1986). They have used it to position themselves in the public debate and apportion a relative chunk of the future broadband market – covering building, setting policy for and reselling the NBN.

For agencies that have limited communications resources to commit to the debate, prioritising communications with specific stakeholders is essential to successfully implementing broader IM strategy. Not prioritising issues could lead to a paranoid managerial approach, where an organisation expends resources anticipating the development of issues that are unlikely to impact it in the future. Drawing on Heath (2009), Bridges writes:

In the issues management process, powerful stakeholder theory helps an organization determine whether to commit to a campaign. An organization's interests are not generally in jeopardy until an emerging issue is associated with at least one organized or organizable group... and has attracted the interest of the mass media. (2004, p. 56)

Powerful stakeholder theory has proven useful to understanding how an organisation can prioritise its IM efforts. However, on some occasions the “organized group” Bridges refers to is the subject organisation itself. Its interests may be in jeopardy, not those of its stakeholders – although on one analysis those stakeholders could be the company's shareholders (e.g. in the cases of iiNet, Optus or Telstra).

In a public policy environment, findings show that issues can be managed almost entirely behind the scenes, and that organisations' interests can be jeopardised even without mass media interest (e.g. regulatory settings sub-issues).

Interview data reflected stakeholders wielding power to influence the debate, understanding that their relationships affect the effectiveness of their IM efforts:

There's a lot of different stakeholder groups in this [NBN debate], and the issues management analysis, I think, always has to go back to who's affected, who's interested, what are their positions, who's a winner, who's a loser, etc... out of all of

this? [on the asbestos issue] there's a link between the issue, who it affects, [and] who's got the capacity to get a message out there. (Liberal Party, Fletcher 2014, pers. comm., 22 August)

Data from Dalby showed that forging alliances with other stakeholders (in iiNet's case, with Communications Alliance, the IIA and Telstra) was key to helping the organisation manage issues. Across all interview data there was recognition of the importance of stakeholder mapping and analysis, so in this sense the findings confirm elements of communications theory (Mahoney 2013; Varey 2001). For a more detailed discussion of stakeholder analysis in the context of the NBN case study, see **Appendix 24 – Stakeholder analysis approaches**.

Much of the practitioner IM writing comes from a corporate perspective (e.g. Harrison 2008; Jaques 2014). However, findings in this study support the view that it is largely applicable in a public policy and government IM context.

Government issue managers are subject to restrictions their corporate counterparts do not have. In Australia, the primary restriction is the risk of a freedom of information request, or in NSW, a *Government Information (Public Access) Act 2009* request. Such a request can result in an agency having to produce documents relating to a topic to the applicant.

This creates challenges for issue managers – by managing issues, and creating records, such as issue strategies or registers, the issue manager may be creating an issue or a risk for the organisation, which in turn requires additional IM. This could cause political embarrassment for the portfolio minister, and draw public and media criticism of the agency. See **Appendix 25 – Government cf. corporate IM** for a detailed discussion of the differences between IM from a government and corporate perspective with reference to the NBN case study.

### 8.2.1 Measurement

This study found that it was often difficult for issue managers to determine which of their practices affected the course of an issue (Anon 10, Lodders), creating a practical challenge for both practitioners and clients in quantifying the results of IM practices. In an environment of growing pantometry, a practice with the conceptual imprecision and

nebulousness of IM may struggle to compete with the more concrete propositions of RM and CM.

The IM focus on keeping issues out of the media and off the public record exacerbates the difficulties in examining IM practices and assessing their relative effectiveness. Some of the most successful IM activities may be those that leave little or no trace for journalists or researchers, and often, on the data, IM is being done best when it is invisible.

In vivo codes were generated on the data for IM testing and measurement, with participants measuring 'acceptance', 'perception', 'prior awareness' and 'sentiment'. Monitoring was reflected in the data (four codes), and was often done on an ad hoc basis (two codes). Other ways of measuring included 'anecdotal' advice, 'polling' and 'research'. Reasons for not measuring often included 'difficulty' and 'resource limitations'.

This summary data, and specific examples discussed in relation to each issue, underscores the challenges practitioners face when assessing the effectiveness of IM interventions in the debate, which goes to RQs 2 – 3.

Interviewees could occasionally discern a direct impact on the debate: for example, op-eds being published in *The Music*, or in the case of iiNet, on *Whirlpool* and subsequently in *The Australian Financial Review*. Dalby noted, 'I mean, you can write to the *Fin Review* and they'll just ignore you... [chuckle] Or, you can post on Whirlpool, and two days later the *Fin Review* is quoting what you said on Whirlpool' (2014, pers. comm., 5 February).

However, measurement was often beyond the resources of smaller organisations, and so they turned to better resourced allies for detailed metrics on reach, frequency and the impact of messaging (e.g. Hutley).

On some occasions interviewees had the impression their contributions made little or no difference to certain policy outcomes in relation to achieving a specific impact on an issue. In response to questions about policy impact, Anon 22 answered, somewhat tongue in cheek, 'Are you asking me to say is my job a complete failure? Probably, yes' (2014, pers. comm.).

There were no examples across any interviews of a system of evidentiary IM measurement. A multitude of factors could interfere with identifying a clear causative link

between use of an IM practice and a subsequent policy outcome. However, interviewees commonly identified areas where they believed their effort contributed to a specific outcome, and this guided the chapter on Findings – Influence of IM on Key Issues.

Measurement is made more difficult by the counterfactual problem: how can an actor know how the issue would have developed had they not intervened? To accurately determine the impact, it would be necessary to compare two mirrored scenarios, one employing an IM intervention but not the other. The complexity of most public policy issues, such as those examined for this study, would make this prohibitively difficult, unless they were somehow modelled in an artificial public sphere (which was beyond the scope of this study).

Furthermore, when issues are being successfully managed, IM can be almost invisible to the C-level within an organisation:

The challenge, or course, is that much of the effort in issue management is spent on anticipating problems before they get worse... evaluating the impact of what *could* have happened if the issue had not been managed; the cost of the crisis that *might* have happened, but was successfully avoided... effective issue management is... inconspicuous when it is successful, and valued most highly in its absence. (Jaques 2014, p. 84)

### 8.2.2 Best practice

The detailed IM examples in preceding chapters, and earlier discussion in this chapter, reveal that the effectiveness of IM practices is contextually determined. On some occasions interviewees found a specific practice (e.g. one-to-one briefings) highly effective, but in other circumstances the same practice – due to countervailing factors – proved less effective (Anon 3, Anon 22). The practice was not being used differently; it was more that the forces opposing the issue may have been more powerful or overwhelming.

Writers propose models of IM “best practice” – for example, Palese and Crane (2002c) outline IMC “best practice indicators” (BPIs) – which set out basic IM processes across three areas: structure, implementation and integration (see **Appendix 26 – IMC best practice indicators**).

From the research data, these BPIs are a useful summative marker of whether an organisation has an IM system or process in place. This study considers how these corporatist measures and models can be adapted and applied in a public sector or policy environment by comparing their effectiveness against the data.

Interviewees were often asked about whether they had issue strategies, or issue registers they were able to share with the researcher. Many interviewees did not report using formal issue registers, but this could be due to the sensitivities associated with maintaining an issue register and sharing it, rather than whether they had one or not. Furthermore, issues may be captured in risk registers, although this would be problematic on a purist approach to IM and RM.

Evidence of formal application of the BPIs was largely absent from interview data, contrasting with the emphasis on formal process models extant in the literature. Galloway notes that 'ideally [IM] is a structured process: in practice, organisations often seek to manage issues less formally' (2005, p. 7), which was confirmed by interview data (Marshall). Interviewees were not specifically asked about the BPIs in keeping with the semi-structured nature of the interviews.

Of the nine BPIs, the following four were suggested across the data, particularly with Marshall (Alcatel-Lucent), who used an IM process primarily focusing on NBN build issues. His process differed from that put forward by Palese and Crane (2002c; IMC 2011) in its informal nature.

Marshall recognised reference to a formal IM process as being 'best practice' (2014, pers. comm., 5 June). Although they did not describe this process, the data suggested a number of interviewees were applying IM approaches aligning to the following BPIs (Anon 21, Havyatt, Marshall):

1. There is an established mechanism to identify current and future issues through environmental scanning / issue analysis.
2. The organisation has adopted a formal process to assign and manage issues (although the process was largely informal).

8. Management of current and future issues is well embedded within the strategic planning and implementation processes of organisational clients or owners.
9. IM is recognised and organisationally positioned as a core management function which is not confined to a single function or department. (Palese & Crane 2002c)

At a political level, it became clear that the ALP had an elaborate IM process in place (Havyatt), but on the data available to the researcher this bespoke approach did not follow an IM process model considered in this study. It can be speculated that a similar process was in place on the Liberal side of politics.

Data demonstrated that although useful in a theoretical context, the issue lifecycle approach, as put forward by Hainsworth (199b) and Meng (1992) and Post (1978), along with updated variations, was not commonly applied in practice in a formal sense.

This may be due to issue managers mentally applying a lifecycle stage approach out of habit or instinct, but not consciously identifying individual stages. Equally, issue managers may be thinking in terms of lobbying, advising or stakeholder engagement (Dalby), so are not consciously aware of formal IM practices.

The variation in issues being tracked for this study demonstrates that issues emerge and develop along various stages of a lifecycle model. Downs (1991) argues that issues develop where there is a timeframe within which an expectation exists that the problem underlying the issue can be solved – although most of the primary NBN issues tracked for this study have continued for many years.

Participants discussed the role of environmental scanning, and its use in giving organisations early warning of issues that could affect their interests (Anon 21, Marshall, Quinlivan). For some interviewees, this was partly addressed through strong internal communications and other staff proactively alerting them to potential issues: 'I think that's a very important thing for a comms professional and issues management professional, is the people in your organisation come to you and tell you things' (Marshall 2014, pers. comm., 5 June).

Quinlivan (DoC) gave a detailed account of environmental scanning, and its limitations, in the management of public policy issues in a government context:

We were surprised occasionally by things that came up, mostly little things that attracted a lot more attention than they often warranted, and often in a perverse way, sometimes in a very mischievous way, issues that were relatively minor get blown up into huge things... implications that we perhaps hadn't quite thought through fully or we'd thought about the 10 different possible problems with an issue and there turned out to be an 11<sup>th</sup> one that we hadn't thought of. (2014, pers. comm., 18 June)

Asbestos was another issue that, on the findings, was not anticipated – despite the use of environmental scanning by a number of organisations (Havyatt). Sensitivity around the practice of IM, and perhaps a lack of awareness of the insights it could bring, meant that government agencies were often not viewing public policy or public affairs issues through an IM prism, which in turn adversely affected their ability to manage issues.

Issues affecting agency policy imperatives developed in the public sphere, and ended up diverting agency time, effort and resources (Anon 14, Quinlivan). These findings suggest that the anticipatory elements of IM theory could benefit from further evidence-based development, particularly in a public policy context.

Small negative issues could also affect public perceptions of policy initiatives, as was seen in findings on many issues that were perceived as negative for nbn (e.g. delay, asbestos, Quigley and Costa Rica). The development of issues in the public sphere was seen to knock the policy debate off course, and detract from substantive policy deliberation. Meanwhile, stakeholders were attempting to draw agencies into the political debate (Kaiser, Quinlivan), which could distract them from delivering EBP in line with their mandates.

When measured against prominent IM models from Palese and Crane (2002b, 2002c) and Jaques (2014), IM processes in organisations in an Australian public sector environment were more organic and ad hoc. A quantitative examination of these processes was not a goal of this study; but even if it had been, the secrecy and suspicion surrounding IM would have made the possibility of gleaning this data unlikely without using the blunt instrument of freedom of information requests. Such an approach would have created hostility with interviewees, and could have resulted in “closing ranks” (given many would know each other), thereby restricting access to data.

Under each BPI the IMC provides detail of specific actions, or ‘reference points’ (see **Appendix 26 – IMC best practice indicators**), that may be undertaken by issue managers. The BPIs focus on elevating IM to a management level, and to ensure that responsibility is assigned for the issues and their management (present in BPIs 2 – 5 inclusive). Even where the BPI is not recognisable in the Australian context, the reference points are recognisable and many overlap with **Appendix 7 – IM practice taxonomy**.

Another reason IM may not be recognised in these organisations, although they are using IM practices, is because it may easily be subsumed under RM, CM or corporate strategy / business planning processes. Interviewees indicated that resources were an issue when aiming to establish IM processes (Anon 20), affecting whether organisations were able to use IM registers and undertake detailed issues analysis.

Although there is an ISO standard on RM – AS/NZS ISO 31000:2009 – at the time of writing, there is no standard devoted to IM in the ISO catalogue. One ISO standard that pertains to CSR, which is sometimes discussed in the context of IM, is ISO 26000:2010.

The types of issues this standard guides organisations on relate to CSR – in particular, sustainable development, human rights and broader social issues in the organisation’s environment. The ISO standard’s aims are focused around protecting organisational reputation, which is an aim shared in public affairs IM:

#### **7.3.2.2 Determining significance**

Once an organization has identified the broad range of issues relevant to its decisions and activities, it should look carefully at the issues identified and develop a set of criteria for deciding which issues have the greatest significance and are most important to the organization. Possible criteria include the:

- extent of the impact of the issue on stakeholders and sustainable development;
- potential effect of taking action or failing to take action on the issue;
- level of stakeholder concern about the issue; and
- identification of the societal expectations of responsible behaviour concerning these impacts.

Issues that are generally considered to be significant are non-compliance with the law; inconsistency with international norms of behaviour; potential violations of human rights; practices that could endanger life or health; and practices that could seriously affect the environment. (ISO 2010)

When prioritising issues, the literature (Fink 1986; Nicholls 2009) recommends assigning numerical values to each issue, then comparing cumulative scores. A simple approach is set out in Table 2 below:

**Table 2. IM planning grid**

	<b>A</b>	<b>B</b>	<b>C</b>
<b>Damage</b>	Low damage (1)	Moderate damage (3)	High damage (5)
<b>Likelihood</b>	Low likelihood (1)	Moderate likelihood (3)	High likelihood (5)
<b>Timing</b>	Long term (1)	Medium term (3)	Short term (5)

*Source: Johnston & Zawawi (2009, p. 306, drawing on Fink 1986)*

Applying this approach to prioritising issues, a practitioner assigns a value for ‘damage’ depending upon whether the issue is of *low*, *medium* or *high* damage, with the values one, three or five respectively. Then the practitioner does the same for ‘likelihood’ and ‘timing’, and adds the figures for a total score per issue.

Issues with higher overall values are more pressing and should be prioritised. These values could be used to rank issues or apply a “traffic light” system to indicate relative importance of issues in an IM database, which could be generated with software (e.g. Filemaker Pro).

Jaques argues for formal issue prioritisation, viewing benefits in relation to ‘commitment, objectivity, confidence, rigour, speed, efficiency, neutrality, simplicity, flexibility and repeatability’ (2014, p. 65). Jaques’ more evolved prioritisation model includes ‘impact, salience/legitimacy, visibility, affectability/leverage, proximity/timing [and] profile’ (p. 64), which is set out at **Appendix 27 – Issue prioritisation model**.

In the same way that Fink’s model (1986) uses a scoring system for priority, Jaques’ model prioritises issues according to the highest numerical value. However, Jaques’ model does

not include *likelihood* as a distinct category, which arguably needs to be included; although in effect this element may be dispersed over other categories in Jaques' model.

More complexity in any IM practice model could create a greater time investment for a busy issue manager, who may already have an informal practice in place (Marshall) and be reluctant to formalise their IM processes.

In a government policy environment, recording issue analysis – including in an issue tracking database – or preparing issue strategies, could create a future exposure for the organisation in the face of a freedom of information request.

Jaques writes that a single one-size-fits-all IM model cannot be established 'because of the genuinely distinct needs of different organizations' and because 'selecting or developing a "best model" could endorse a prescriptive approach which would inevitably be highly subjective and might tend to freeze the development of the discipline at a particular point' (2005 p. 9). Data from interviews for the NBN case study did not immediately suggest a best practice model, or even a distinct set of indicators as espoused by the IMC, and findings here support Jaques' view on the wisdom of prescriptive practice models (2005).

The sixth BPI recommends that issues should immediately be elevated to the C-level in an organisation. Again, data from interviewees suggests this is not feasible in many large public sector or corporate environments. Management would have little interest in the vast majority of issues, and there is unlikely to be any strategic advantage in raising these issues to C-level prematurely.

Where an organisation is able to dedicate resources to IM, as was the case with the Office of the Emergency Services Commissioner (OESC) during the 2009 Victorian Bushfires Royal Commission (the "Royal Commission"), an issue manager could act as a gatekeeper for the management of issues within that organisation. S/he could determine which issues are at a level of seriousness where escalation to C-level is necessary. See **Appendix 1 – IM case study comparisons** for more details on this and other emergency management examples.

For the OESC and comparable organisations involved in emergency response management, this may only have been required where issues measured against

likelihood, timing and impact measures had reached a numerical level of seriousness – for example using issues analysis models proposed by Fink (1986) and Nicholls and Glenny (2005). In discussing the role of IM processes and the level at which they should operate, Jaques writes:

...while some organizations have an apparent desire to push the management of issues down to middle levels, top level management should have direct involvement both in the issue management process and in the management of specific key issues, particularly to meet governance and reporting obligations, and to protect shareholder and other stakeholder interests. (2005, p. 10)

This study supports the view that C-level engagement in IM is necessary for high-impact, high-likelihood, imminent issues. As Jaques notes, ‘involvement at the most senior level also provides strategic overview across issues’ (2005, p. 10). However, other issues could be better assigned to issue managers at other levels in an organisation.

As none of the interviewees involved in NBN policy setting were solely described as *issue managers*, it was not feasible, on the data available, to determine the extent to which their roles matched Palese and Crane’s ‘issue process steward’ model (2002a, see **Appendix 1 – IM case study comparisons**).

In many cases the data did not reveal an IM process at the organisation, but that could be a consequence of a reluctance to candidly describe the process, or to even characterise it is an IM process – as opposed to a CM or RM process.

One approach, supported by this analysis, could see an issue manager tracking, analysing, monitoring and advising on issues, and identifying “owners” for each issue – rather than the issue manager taking responsibility for each individual issue, despite not being an expert on its subject matter.

Jaques contends ‘issue owners should be members of core management, and periodic Strategic Planning should specifically seek out and address the potential of issues – both positive and negative’ (2005, p. 11). This would give issue owners the advantage of being able to progress the management of issues, and they could apply advice from issue managers located in the communications or government relations teams.

Many public sector organisations have RM systems in place (e.g. NSW Government agency Audit and Risk Committees). Much of the language around risk and issues overlaps; “risk” may appear more acceptable, and be more defensible if documents have to be disclosed to media organisations pursuant to freedom of information requests.

Palese and Crane have developed an *Issue Consistency Measure* (2002c), designed to help agencies identify vulnerabilities, which emphasises the need to establish accountability in IM systems within organisations. It considers dimensions of intent/thought, performance/deed and reporting/word, in relation to each issue (2002c).

Ironically, the same emphasis on accountability could have an inverse impact in a public sector context, where astute IM could help an agency avoid being held to account in the face of public scrutiny, potentially defeating open government goals.

Palese and Crane see proximity to stakeholders and key audiences as the touch point against which an IM process in an organisation is measured. They propose four IM models within an organisation:

1. **Observational IM** – Where the entity has little interaction with key audiences, so the IM process merely has a ‘research or data tracking function’ (2002a, p. 5).
2. **Communicative IM** – Where issue managers are in communication with key audiences, but where the organisation does not have a defined issue process steward role or function. In this instance intelligence may be ‘gathered, analyzed and acted upon with inconsistent results’ (2002a, p. 5).
3. **Co-ordinated IM** – Where the issue process steward role has been created and this role is immersed in a world of ‘key audiences’. In this scenario the issue process steward can ‘design and advocate innovative programs and processes that can enhance intelligence gathering, implementation of communications strategy and measurement’ (2002a, p. 5).
4. **Integrated IM** – Where senior management is involved in IM process, with additional understanding and immersion, as well as anticipatory IM.

Applying this model to NBN public policy IM across organisations interviewed, models two and four were occasionally glimpsed through the data. As previously described, this is not conclusive of whether other models existed in practice in this case study. Even

interviewing multiple individuals from an organisation may not reveal the whole IM process, because the person to whom it is visible may not be identified as the issue manager or issue process steward equivalent within the organisation.

From the Australian NBN policy experience, data analysis, and textual analysis of secondary materials, it appears an integrated IM model as espoused by Palese and Crane would be optimal, with the qualifier of issue filtering, so only prioritised issues are brought to C-level. Interviews with former C-level staff suggested they preferred to be involved with the management of issues crossing public affairs and other organisational functions.

Palese and Crane see IM as a ‘leadership process that defines the strategic common ground between a company and its key audiences’ (2002b, p. 1). IM for them is tied to innovation, diversity and collaboration. They laud an Issue Management Team (IMT) approach to IM, with a group that ‘incorporates diverse people and perspectives (both inside and outside of the company) and collaboratively gathers, analyses and reports intelligence on emerging issue risk and opportunity’ (2002b, p. 2). See **Appendix 1 – IM case study comparisons** for more discussion of IMTs and the role of an issue process steward.

The sensitivity of NBN issues, and the media risk, means that having a large IMT – including those from outside the organisation – is fraught. One risk is that a disgruntled employee may contact a media organisation.

Sensitive IM requires that the issue manager or steward liaise directly with the issue owner, and other than engaging executives, does not involve a broader employee base in the issue. In the case of highly sensitive issues, Palese and Crane’s (2002b) approach is not practicable on the interview data.

Palese and Crane also recommend:

- integrate the IM process with existing business processes to create a coherent, systematic governance process, and
- develop... business process design competencies to continually increase the internal and external diversity of issue-centric dialogue in order to fuel “no

surprises” governance, to serve as a source of innovation and to create competitive advantage. (2002b, p. 8)

Data suggests that this integrated approach would be effective (Marshall), and in other instances – such as Anon 14 at nbn – participants in the debate may have been better able to manage NBN policy issues had they been in a position to adopt a more integrated IM approach.

Opportunities to develop new public policy arise in very specific circumstances, and Kingdon’s ‘policy windows’ concept (2002, p. 165) provides a useful model to explain and help predict when these circumstances may arise. Interview data discussing the origins of the NBN supported this model – for example, the emergence of a perceived market failure and a solution of structural separation (Forman).

Kingdon describes a policy window as ‘an opportunity for advocates to push their pet solutions, or to push attention to their special problems’ (2002, p. 165). He finds that, in a US policy context, ‘advocates lie in wait in and around government with their solutions at hand, waiting for problems to float by to which they can attach their solutions’ (p. 165). Soroka, in assessing agenda setting and its influence on policy-making processes, also notes the importance of ‘policy windows’:

There are three independent streams, or processes: problems, policies and politics. The possibility for policy initiation or changes is at its greatest when all three streams come together – when problems are coupled with policy solutions at a time when it is politically feasible to implement change.

This coupling of streams can result in a policy window, generally brought on by changes in the problem or political streams. Windows can appear predictably (as a result of elections, for instance) or unpredictably (brought on, for example, by a sudden crisis). (1999, p. 768)

Other researchers have found empirical evidence of policy windows in comparable jurisdictions to Australia, for example, in Canada (Howlett 1998). The literature and the data indicate a close relationship between effective policymaking and agenda setting. On the data from interviewees, where policymakers, activists, advocates or agitators are able

to use IM practices to set the agenda (Forman), they can help create or take best advantage of policy windows that appear.

Crable and Vibbert described taking a 'catalytic' IM approach: 'the strategy is offensive in the best strategic sense of the word, and... affirmative, rather than negative: it seeks to create policy opportunities, rather than to defeat trends or policies which seem undesirable' (1985, p. 10).

The findings supported a 'dynamic' (Jones & Chase 1979) or 'catalytic' (Crable & Vibbert 1985) approach to IM, as 'organizations wishing to catalyze policy processes begin to manage the 'creation' of an issue; they begin to help boost an issue through each status of its life cycle' (p. 13).

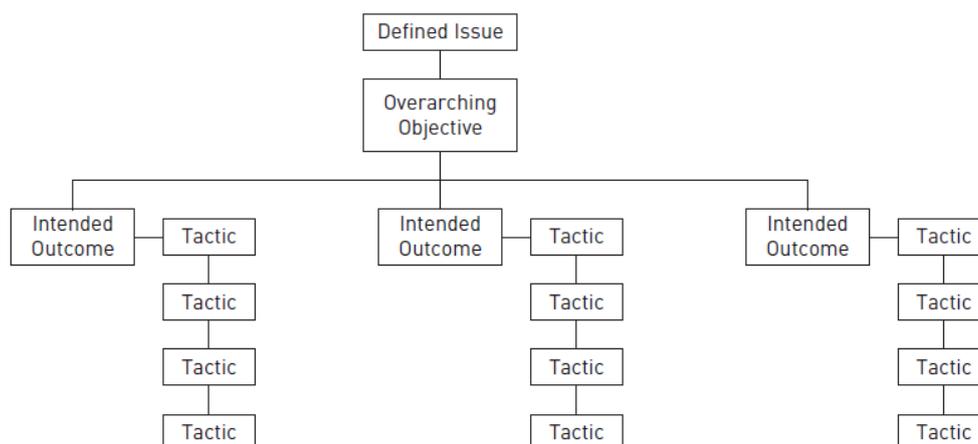
Political changes in Australia affected the development of NBN policy across most issues tracked for this study. For example, developing NBN policy ahead of elections was a common theme: the ALP promoted the NBN at the 2010 election, and the overall policy of building, and retained the policy after that election, partly due its sustained popularity with voters (IBES 2014; Stanton). This arguably provided a policy window for Australian policymakers, such as those at the DoC, to further develop and promote the rollout of the NBN.

The data shows policy windows emerged at varying speeds. For example, the NBN was framed as a way of addressing the digital divide, an issue that moved slowly and still persists; meanwhile, policy on the battery backup issue had to evolve quickly in response to a potential economic crisis from the greater cost of building the NBN (Anon 10).

Findings in this study suggest that in order for practitioners to successfully influence the policy agenda, they need to keenly appreciate the role of timing, and as part of environmental scanning they need to take advantage of policy windows to progress initiatives. In this study, organisations were seen using IM to create policy opportunities and policy windows (or to quicken their emergence), such as with the structural separation of Telstra (Forman).

As well as BPIs, process models have been developed to guide practitioners, and to represent best practice IM. These models typically identify inputs and outputs, and they have evolved over recent years. Jaques developed a 'Do-it Plan' for IM, which involves

'definition, objective, intended outcomes and tactics' (2014, p. 79). This model is set out below in Figure 12:

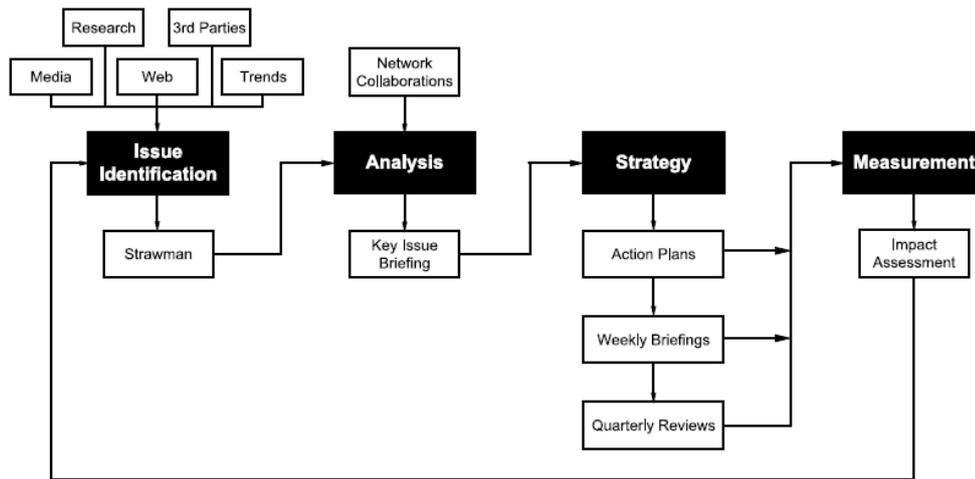


**Figure 12. Do-It Plan IM model**  
*Source: Jaques 2014 (p. 79)*

This model benefits from simplicity; for busy practitioners in the NBN case study, it would likely be an easier model to adopt. Although interviewees did not use the language of “tactics”, the basic elements of Jaques’ model in Figure 12 were evident in the data.

Interviewees clearly defined issues (or sub-issues); they had objectives in managing the issues (which were not always clearly defined), preferred outcomes supporting those objectives, and specific methods (or tactics) used to achieve those outcomes.

In Jaques’ model, each ‘intended outcome makes a positive contribution to achieving the overarching objective by identifying a specific outcome that will help deliver that objective’ (2014, p. 82). Jaques’ model contrasts with a more process-oriented model proposed by Palese and Crane (2002b), which maps out IM inputs and outputs (Figure 13 overleaf):



**Figure 13. IM process inputs & outputs**  
*Source: Palese & Crane (2002b, p. 288)*

The process orientation in the Palese and Crane model (above) can also be seen in a recent IM model from Jaques (2014), at **Appendix 6 – IM process flow**. Jaques’ 2014 model is more nuanced, adding a reprioritisation mechanism and feedback to the issue analysis stage – which on this analysis is a strength of Jaques’ model. It is also supported by interviewees’ descriptions of effective IM practice: they anticipated the course of the issue, media and social media reporting, and subsequently reprioritised the issue by comparison with others being managed.

Some interviewees referred to environmental scanning as a specific element of their practice, noting how essential this was for effective IM (Anon 21); however, others did not. They may have been better positioned to influence the course of issues had they applied a more formalised environmental scanning approach – particularly in a public sector context – thereby preserving agency resources (for instance, when managing the battery backup issue). Many issue managers were forced into reactive positions, which could arguably have been avoided through adopting a more anticipatory approach (Anderson 1997).

Interviewees shared artefacts with the researcher, including issue strategies, which enriched and complemented the primary dataset (interview transcripts and analysis). Issue strategies involved multiple concurrent implementation strands (not unlike the Do-It Plan IM Model, Figure 12), contributing to a single overarching objective. Notably, interviewees seldom described evaluation or measurement as a discrete phase – although it is reflected in IM theory (Jaques 2014).

Development of the IM strategy itself is a component of best practice, which is variously represented as a position paper, action plan or strategy in the literature and the IM models discussed in this study. Strategy is essential to organisations positioning themselves in relation to resources, and the study's findings on strategy as practice support Clegg, who writes that 'strategy does not so much describe the future as cause this future to come into existence through this process' (2012, p. 16).

Clegg sees strategising as 'inextricably intertwined with the exercise of power' (2011, p. 138), which is seen in the findings, with organisations exercising power in the public sphere through the application of IM strategy.

The elements of IM strategies were dependent upon the type of issue being considered, but in one example provided by an interviewee from a major telecommunications company, the IM strategy included: issue, background, scope, messaging, media plan, stakeholder plan, political plan, key dates and further background (Anon 20).

Applying Clegg (2012), putting IM strategy into practice can produce a desired organisational future. 'Messaging' sets out the messages that will be conveyed to target audiences, and will help to mould stakeholder opinion. The three planning elements ('media', 'stakeholder' and 'political'), at three levels, help to bring about a desired future state – in which the issue is neutralised.

Effective IM requires additional subject matter understanding of an organisation's broader communications environment and position in the public sphere – going beyond the simple application of a template. Nonetheless, this study has revealed key elements that should be included in SIM planning.

Griffin (2014), taking a reputation-based approach to IM, describes the purpose of an IM process as being: 'to find and execute the right strategy that will move an identified issue from a state of reputation risk to a managed state or to resolution... the key options will usually fall into two main categories: change what the organization does, or change the debate' (p. 189).

Griffin proposes an IM strategy template, which he believes should contain:

1. issue description
2. IM ownership, reporting and team
3. current situation, 'where the issue is at this moment in time'
4. key risks [for the organisation]
5. current business position
6. communications strategy
7. stakeholder assessment
8. scenario planning, 'assess the risk going forward... assessment of triggers, scenarios and impacts'
9. objectives of the IM strategy
10. strategic options, and
11. strategy recommendation. (2014, p. 190)

The literature review, augmented by findings from the interview data, and secondary materials and artefacts shared with the researcher, suggests that an IM strategy should ideally include the following basic components – loosely based on a communications or PR strategy (Mahoney 2013) approach:

1. issue description
2. situation analysis (internal environment, external environment, SWOT analysis)
3. political analysis
4. risk analysis
5. goals, objectives (and intended outcomes – Jaques 2014)
6. key messages
7. stakeholders (primary, secondary, intervening – Mahoney 2013)
8. strategic options
9. communications strategies and tactics
10. budget
11. implementation schedule, and
12. evaluation.

Many elements of Jaques' Do-It Plan IM Model (Figure 12) are represented above. Jaques (2014) provides a detailed worked example of his model, which derives significant

strength from including more than one 'intended outcome' – all in support of the 'overarching objective' (2014, p. 312).

Drawing on all the data from interviewees, their experiences of applying IM practices, and assessments of relative effectiveness – along with relevant IM theory – best practice IM in an Australian policy environment includes:

- Strong environmental scanning and awareness (including for social media).
- Using sound communications and messaging principles, including conversational models for better engagement (Varey 2001).
  - Messaging should be targeted, consistent, simple, transparent and honest (based on message content principles evident in interview data).
- Provision of clear information (the third most common IM practice on the data).
- Aligning IM initiatives to policy windows and taking advantage of timing, shifts (or anticipated shifts) in political or public interests, and employing activist IM as necessary.
- Issue strategy selection – which chain(s) of influence are being employed, and when (sequentially or concurrently etc.)
- Understanding which IM practice to use in which scenario.
- Taking advantage of public and closed formal submission processes (the most common IM practice on the data).
- Building alliances and finding champions.
- Knowing when to keep quiet (e.g. example of the Quigley and Costa Rica issue).
- Understanding whether your organisational stakeholders will be influenced by debate in a public sphere or social media space, and whether this affects your strategic interests in a material way.
- Ability to respond quickly in real time, given accelerated issue lifecycles (as Rhodie did using social media).
- Establishing C-level buy-in to IM engagement and interventions.
- Managing stakeholder expectations (helping to address any potential expectation or legitimacy gaps).

This chapter, by critiquing existing practice models, and building on them, has contributed to an understanding of the work of IM practitioners. It has assessed examples of IM

practice against IM theory, and measured IM theory against practices emerging from the interview data. Finally, it has proposed key elements of an IM strategy, and indicia of best practice in a public policy environment.

## **8.3 Implications**

The findings and discussion of IM have implications for policymaking, the public sphere, society and democracy, and ultimately for policymakers and industry bodies that have oversight of the work of IM practitioners.

### **8.3.1 The public sphere and democracy**

This study has shown that public sphere theory is useful to aiding in our understanding of communications systems and networks in society. It has shown that IM is an integral part of the public sphere, with its influence felt across public communication networks and systems.

Public sphere models, including a modified Habermassian, deliberative public sphere, do not fully account for the often unseen influence of IM. This influence can leave a public debate – that is apparently deliberative and democratic on a superficial analysis – subject to manipulation by organisations with vested interests, that are most likely retaining the services of issue managers.

For Habermas, media professionals produce an ‘elite discourse which is fed by participants who seek access and have influence on mass communication’ (Maia 2011, p. 149). This discourse is present in the NBN debate: the key participating actors range from IM practitioners in stakeholder organisations to journalists in the technology press.

In normative notions of the public sphere, ‘ideological factors and competing material interests could be effectively set aside in the pursuit of genuine consensus through interpersonal dialogue’ (Gardiner 2004, p. 29). This was not borne out by research undertaken for this study, which demonstrated that ideological factors (expressed by Liberal and ALP interviewees) and material interests (powerful actors in the debate) were central to the discussion about the NBN.

The use of IM by powerful actors in the debate was evident on interview data, creating a potential asymmetry that militates against less well-funded participants such as ACCAN successfully conveying messages.

Better resourced entities were shown to be using SIM as a means to exercise their power in the public sphere. In this regard, the findings support Foucauldian theory on the relationship between discourse and power (1978).

Although in many instances interviewees were aware of the effects of IM on the public debate, they were often unaware of consequent policy or societal effects. nbn generally took the view that it did not seek to modify policy, and was focused on implementation, with an acknowledgement that the NBN rollout is 'government policy, the decision's made, it happens to be the right one, let's get out, let's be decisive in this, and explain it as well as we can to as many people as we can, why this is a good thing. (Anon 2 2014, pers. comm.)

Interviewees viewed this as having helped them stay out of political "crossfire", but content analysis and examination of other sources demonstrated that this approach was not always successful. Data showed there was a need for the NBN argument to be prosecuted in the public sphere (Havyatt, Kaiser), and how the course of this debate affected the development of NBN policy.

The concept of public sphericles is relevant to understanding the role of IM in a social media environment, and is reflected by perceptions among interviewees, including Coalition Adviser Anon 19, that sub-group discussions in social media have a limited impact on the broader public debate.

Dahlgren (2005) notes the internet has destabilised political communication, creating 'an impressive communicative heterogeneity', the negative side of which is 'fragmentation, with the public sphere veering towards disparate islands of political communication' (2005, p. 152). This was evident in the data (Dalby) with the growth of online communities such as Whirlpool.

This study supports many of the critiques of the idealised, normative Habermassian public sphere set out in the literature review and theoretical framework (Karpinnen, Moe & Svensson 2008; Mouffe 1999; Wilson 2012). It further supports the view that undistorted communication and rational consensus may not be attainable (Roberts & Crossley 2004).

In this study, the high level of technical literacy among those engaged in public debate, along with the presence of online public spheres as sites for public debate and,

potentially, deliberation, challenges Habermasian notions of a singular public sphere. Instead it supports Curran's (2002) and Dahlgren's analyses (2009).

Habermas (1977) discusses consensus-building through communication. Interview data demonstrated the importance of alliance-building and creating coalitions (e.g. ACCAN on the copyright issue), and the necessity to engage stakeholders in building these coalitions: 'In short, the communicatively produced power of common convictions originates in the fact that those involved are oriented to reaching agreement and not primarily to their respective individual successes' (Habermas 1977, p. 6).

For Habermas, this communicative concept of power is essential to a functioning public sphere, and to the free flow of information and exchange of opinions within it. This communicative aspect is also key to the legitimation of power: 'Legitimate power *arises* only among those who form common convictions in unconstrained communication' (Habermas 1977, p. 18, italics in original).

Interview data demonstrated that IM plays a key role in stakeholder management, and in aiding the formation of common convictions. Applying Habermas and Arendt, this assists the legitimate concentration of power with NBN policymakers.

Interviewees frequently referred to using IM behind the scenes; 13 codes were recorded at the in vivo node 'behind the scenes'. Managing issues in this way was essential to the success of IM efforts, yet this is contrary to principles of transparency in public policymaking. This is notwithstanding the finding that making 'submissions' was the most common IM practice, which is ordinarily commonly an open, public process.

Managing issues behind the scenes was often effective; examples emerged of issues such as battery backup data being managed out of the media, resulting in positive outcomes for stakeholders. Keeping an issue out of the media and out of the stakeholder debate occasionally helped interviewees progress the issue without additional distraction (Havyatt re the USO).

Transparency may be beneficial to open deliberation in the Habermasian model, but some issues were best resolved among concentrated groups of policy actors. Data suggested that the broader media sphere was not always suited to in-depth, technical

policy analysis and discussion required for some NBN issues, such as the details of the SSU or other specific regulatory settings (Fletcher).

Data and examples considered for this study confirmed that IM can be used by actors in the public sphere to distort communication and can help hide certain interests or organisational motivations, supporting writing by Heath (2006) and Boyd and Waymer: ‘...idealized equal access to dialogue in the public sphere is a fiction because there are myriad hidden stakes and values that often go uncommunicated and can distort communication’ (2011, p. 483).

nbn engaged in discussion in the public sphere and encouraged rural media to report on new uses of the NBN and rollouts in parts of regional Australia. This raised the profile of regional MPs, and could support the incumbent government.

These regional appearances supported wider political interests, which were somewhat hidden – members of the public in regional areas only saw nbn investing in regional infrastructure. IM and careful media management served to keep public recognition of the other interests out of the media, maintaining the focus on regional spending:

The regional MPs love it, [it] raises their profile, and it doesn’t hurt when someone like Wayne Swan turns up or the Prime Minister, as happened in Brunswick, they come in and suddenly every man and his dog is there. Loving it. They just lap it up. (Anon 2 2014, pers. comm.)

A separate in vivo node for ‘issue creation’ had five codes by the final data analysis. This study found that issue managers use issue activism to set the public policy agenda, with significant consequences where this affects matters of national significance.

For example, central to the CCC’s approach to structural separation was issue redefinition, and the approach they adopted supports Jaques (2014) and Heath in their formulation of redefinition and its role in activist IM. Heath writes that:

Activists use redefinition to place a new interpretation on a situation, a product (such as cigarettes) or a service, a corporation or industry, or a governmental agency. If the reinterpretation catches on, especially with reporters and followers, the company, industry or agency has become vulnerable to change. (1997, p. 168)

Jaques proposes three approaches to redefinition in activist IM, with the structural separation issue being redefined as relating to a failure of competition in the ‘transitional target approach’ (Figure 14 below):

	Moving target approach	Transitional target approach	Multiple target approach
Field of debate	Remains generally within a given objective discipline	Deliberately moves from objective fact to subjective responses	Covers as many different fields as possible, both subjective and objective
Timing	Issue progressively redefined as each concern is addressed	Moves ground before objective concerns can be addressed	Multiple concerns and allegations are raised simultaneously
Broad purpose	Maintains appearance of objective debate but keeps responder off balance with fresh plausible allegations	Maximises emotive content of issue by focus on areas of opinion such as ethics, values or standards	Confuses responder, exhausts his resources and maximises the number and variety of different stakeholders

**Figure 14. Activist issue redefinition grid**  
 Source: Jaques (2014, p. 104)

This use of issue activism by parties to the NBN debate has consequences for the public sphere, as participants in the debate may assume only NGOs are using activist practices, and not expect them from corporate or government interests.

As Hutley noted, ‘good ideas need to be heard sometimes, and they sometimes are a bit slower to articulate than sound bites’ (2014, pers. comm., 6 June). Specialised ICT policy debates may be better suited to smaller spheres, such as those described by Dahlgren (2005), which occur behind closed doors, at industry/government forums, or in online community spaces like Whirlpool. In some circumstances these are no longer public spheres, but *intermediate spaces*.

The use of research (41 codes, aggregated) raises questions about the extent to which research for hire, outside of the context of impartial, independent or academic settings, is contributing to the manipulation of the debate. ‘Reports’ and ‘studies, projects’ were the most common types of research. This could devalue impartial analysis in the debate, as policy actors commission reports which support their strategic objectives.

Some interviewees (Conroy, Forman, Havyatt) suggested that this occurred with multiple reviews into the NBN at the behest of the incoming Liberal Government. Given the high costs of these reports – the *Scales Review* cost \$375,000 and the *Vertigan Review* cost

\$1.4m (APH 2015) – it appears that participants in the debate with deeper pockets may be able to commission more in-depth reports, which could ultimately support their positions, and lay the groundwork for future policy changes they are pursuing.

This study confirms the in-depth involvement of government agencies in the mediated public sphere, ‘communication is a central activity of the State in the modern age. It is the bread and butter of everyday life in government’ (Wilson 2012, p. 22). Campaigns that aim to change public behaviour rely almost entirely on communications through the public sphere, and this has also been seen with AIDS and diet campaigns (Wilson 2012).

Wilson argues: ‘communication is a central activity of the State in the modern age. It is the bread and butter of everyday life in government’ (2012, p. 22). Campaigns that aim to change public behaviour – such as AIDS and diet campaigns – rely almost entirely on public sphere communications (Wilson 2012). This study confirms the in-depth involvement of government agencies in the mediated public sphere.

For Wilson, ‘it is possible for a major change in the character of the institutions of the state to take place without substantial comment or protest. Discussion in the public sphere is selective. At any one time there is an intense focus on some issues but also silence on other aspects of public life that may in the long run be more important’ (2012, p. 26). This study reveals that in part, the selectivity of the public sphere may be due to the work of issue managers and the ability of some stakeholders to keep issues out of the conversation (Lukes 1977).

Wilson’s analysis, although insightful, fails to explain silences in the public sphere. Wilson contends that where there is more noise from governments in the public sphere, this sometimes indicates less policy is happening. However he does not provide supporting data for this or explain its mechanism.

Government stakeholders including the DoC and ACMA have a key role to play in public debate. Taking a proactive communications approach helps government mould perceptions of its activities, which can significantly affect whether a policy implementation succeeds or fails. An expectation gap may also emerge: ‘If a government creates one perception in the public sphere of what it is doing and silently implements another reality, the dangers for the citizen may be very great’ (Wilson 2012, p. 27).

This study has shown that in some instances IM is being used in Australia to influence public debate, and it does influence public policy – not only in the inception and development of policy at multiple points in the policy process (Althaus, Bridgman & Davis 2013), but also in the successful implementation of policy. The data confirms that IM is not ‘progressing towards extinction’, as Jaques (2012) feared, but is very widely practised – at least in this case study, with far-reaching consequences for policy, society and democracy.

Stanton reflected on some of the challenges for government in NBN policymaking, ‘Today’s telecommunications legislators face the unenviable task of trying to make a traditional and unwieldy law-making and regulatory process keep pace with accelerating advances in technology, product development and consumer usage patterns’ (2011, p. 21.5). Technology changes have been at the heart of many challenges for government in developing and implementing policy leading to optimal outcomes for the Australian public.

Mixed into the NBN debate is the question of the role that the technological changes that come with the NBN will play in affecting the Australian democratic political system.

Curran writes:

Technological determinism transcends national frontiers and represents a proposed ‘master narrative’. Instead of seeing media as linked to change, it portrays... communications technology... as being the origin and fount of change. (2011, p. 136)

Notions of technological determinism arguably underpin assumptions about the NBN and about its transformative potential in Australian society. When asked about utopianism affecting project design decisions, Conroy noted, ‘so, “do it once, do it right, do it with fibre,” that’s not a utopian vision, this is about the laws of physics’ (2015, pers. comm., 18 February).

However, nbn itself appears to have been influenced by technological determinism and an engineering utopianism, as Marshall noted:

I wouldn’t be the first to make the observation that NBN Co had an engineering-led agenda to create the best possible network. My view is that ultimately the purity of

that vision did actually curtail some of NBN Co's ability to meet its objectives, to meet rollout targets, which opened it to a lot of criticism in such a politically heated environment. (2014, pers. comm., 5 June).

There are arguably parallels between this utopianism reflected in interview data and wider impacts of technological determinism on public debate and on media reporting: Curran calls for a 'sceptical caution when assessing seemingly authoritative predictions about the impact of new communications technology' (2011, p. 99).

Taking a technological determinist approach, many involved in the NBN debate saw democratic and societal benefits to enabling new communications technologies, with potential for broadened political and social participation.

Bringing together supply and demand factors is essential to raising the use of broadband (Cava-Ferreruel & Alabau-Munoz 2006). This was borne out by data analysis of interviews – nbn demonstrating the uses of the NBN – as well as ICT policy literature. The NBN in Australia can have a significant impact on the supply side, by making the infrastructure available and affordable, but the demand side has arguably been neglected.

Data and analysis reveal tension between the role of IM in the pursuit of organisational interests in the debate, and EBP – which should serve the interests of society and "the greater good". So when an organisation enters the debate in the public sphere, using an IM practice, it makes claims about the social benefits of its preferred approach, but ultimately that organisation is acting in the interests of its stakeholders or shareholders.

Arguably, the organisation is not acting in the interests of society, and so the tension emerges. However, this can be resolved with CSR, which can bridge the gap and help to align the two interests (Heath & Nelson 1986), leading to an outcome that is in the organisation's long strategic interests *and* in the best interests of society.

Head has written that: '...policy decisions are not deduced primarily from facts and empirical models, but from politics, judgement and debates. Policy domains are inherently marked by the interplay of facts, norms and desired actions' (2008, p. 9). These elements were all present on the interview data, confirming Head's analysis.

Discussing the role of EBP in the Australian polity, Head pointedly asks:

Do policymakers really pay attention to ‘evidence’ in making their decisions? Clearly they do, but they often choose to consider sources of expertise beyond the analytical reports produced by social scientists, program evaluators, and technical advisors. In some cases, the evidence that is actually utilised might be that which confirms the currently preferred position of decision-makers. (2013, p. 397)

Head’s contention is reflected in interview data, content analysis and examination of secondary materials for this study, particularly regarding the use of research. Multiple reviews of nbn suggest that rather than seeking evidence impartially and objectively, these reviews were designed to elicit findings favourable to a particular pre-determined position; several interviewees raised this allegation, and not only politically involved interviewees.

Dalby, formerly of iiNet, noted, ‘most of those sorts of inquiries are about the parliamentarians having a bit of an argument, rather than necessarily a way to gather information to drive public policy, I’m really cynical about that’ (2014, pers. comm., 5 February).

The extent to which inquiries or committee processes themselves become IM practices varies depending on the nature of the inquiry, but findings uncovered in this study suggest they can and do satisfy these purposes, to the detriment of the polity and its democratic processes.

Head notes, and the interview data reflects, that ‘Ministerial minders, business lobbyists, media commentators, reports by think tanks, leaders of community organisations, and many other actors may influence the manner in which policy judgements are made’ (2013, p. 398). Head’s analysis “begs the question” about the role of IM in these processes. His analysis fails to recognise the role of the media and political factors in favouring one policy outcome over another.

Perhaps *the political* is the problem in the NBN policy debate:

Political advertising is necessarily full of deception, half-truths, exaggerations and falsities. It is that way because all forms of politics are that way, but political lies are not like lies about soap or cornflakes...

If you found a way to make all political advertising rational and accurate, or even if you improved its rationality and accuracy greatly, what would you have to do?...

You would have to eliminate politics as we know it. (Mayer 1994, p. 119)

Although Mayer's view is controversial and reductionist, applied in the immediate context it goes to the question of how policy statements from major political parties should be analysed in this study, and how they relate to EBP. On one approach, they are policy pronouncements; but on the other, they are cleverly crafted marketing pieces, often borne of or related to IM.

Watts (2014) fills the blanks in Head's analysis, although rather than uncovering the missing link of the role of public affairs in the policy process, he adopts a strongly anti-empiricist and anti-positivist stance, attacking EBP at its core and accusing it of 'scientism'.

In a critique of Head and Alford (2008), Watts (2014) notes the question of persistent 'wicked problems' in policymaking, and the 'dire consequences for any policy maker who believes that 'technical' or 'objective' evidence is either available or useful in the wide range of policy fields' (p. 42).

Drawing on Arendt, Watts (2014) argues that truth in politics is not attainable, which has implications for efforts to achieve EBP in broadband policy. Yet politicians still deploy truth rhetorically:

Truth though powerless and always defeated in a head-on clash with the powers that be, possesses a strength of its own: whatever those in power may contrive, they are unable to discover or invent a viable substitute for it. (Arendt 1968, p. 309)

Arendt argues there is little to prevent the fabrication of a new reality in order to prevent unpalatable facts from gaining prominence. For Watts, 'in these circumstances making

factual truth claims is possible only by taking a position beyond the political realm' (2014, p. 43). Coming around to a more pragmatic position, Watts concludes:

It is only by means of public debate, that one can begin to determine what in one's opinion is true. And that difficult project while always thwarted by spin is likewise enabled by a thoughtful regard for good evidence. (2014, p. 43)

There is a subtext in Watts' writing that opposes the very foundations of social science and related assumptions about EBP. Watts draws on Spencer (1987) to interrogate the predominance of scientific reasoning, and the methodologies employed by social science.

Head acknowledges some of the criticisms of EBP, referring to Neylan (2008). Because social policy evidence has a particular "intrinsic authority", governments often advance it to support individual policy initiatives, as was the case with extensive use of research by parties to the NBN debate.

Research has 'the appearance of certainty and a legitimacy that seems beyond challenge' (Head 2014, p. 401). Various authors point to the use of key indicators to measure the progress of policy implementation, which could in this case study be represented by the *Scales Review*.

This study confirmed the emphasis on EBP in policymaking, and its value in relation to NBN policy settings. However, IM can interfere at many points in the policymaking process, as demonstrated here. IM may also serve to achieve a better policy outcome: for example, where it is used to manage an issue that is minor in substance (although this is a subjective judgement), but would otherwise develop into a crisis and derail a legitimate policy process or implementation.

The findings of this study have implications for the functioning of the traditional Davis Policy Cycle (Althaus, Bridgman & Davis 2013). In the case of the NBN, and potentially other large infrastructure projects, data from interviewees indicates that the traditional policymaking models need a refresh. The Davis Policy Cycle model inadequately accounts for the function of public affairs and PR advisers, and the influence they exert on policy processes, directly and indirectly.

The examples of IM in practice in this study show that many factors influence the policymaking process, including stakeholder perceptions of policies – which are in turn affected by the use of IM techniques (see **Appendix 24 – Stakeholder analysis approaches**).

The politicisation of the NBN, and of almost every issue that emerged from the interview data, indicates a potential subversion of EBP as espoused by theorists (Althaus, Brigman & Davis 2013; Watts 2014). The appropriation of research studies for the purposes of agenda setting and framing could contribute to devaluing EBP in the debate, as EBP becomes another term that is co-opted for political expediency.

Findings on the CBA demonstrated attempts to frame this issue as being damaging for the NBN overall (Anon 19). Data suggested the issue was primarily viewed as negative for the NBN project (Havyatt, Kaiser). Meanwhile, Quinlivan noted that the 2010 *NBN Implementation Study* had already covered most of the components of a CBA.

The NBN project demonstrates the use of CBAs in the public debate, and examples of disparate narratives around the efficacy of undertaking them. Interviewees made the observation that a CBA could be manipulated to represent any preferred outcome (Conroy, Havyatt, Marshall).

Use of IM practices could help frame a CBA issue in the public debate to emphasise or de-emphasise respective components of it. Yet cost-benefit was primed in the public debate and narrative around the NBN, and has been reflected in other major infrastructure projects, notwithstanding its arguable lack of EBP value in these scenarios.

Any political party championing the NBN would be gambling on future technological developments. However, this is comparable to other large infrastructure projects in Australian history, as governments face an ongoing challenge with predicting the usefulness of new technologies and infrastructure for decades into the future, and avoiding obsolescence.

The NBN project was seen as visionary in public debate, and the Liberal Party ultimately appreciated its value, as they decided to retain the project after winning office in 2013. Carrier stakeholders saw the NBN as a positive project, and lent their support to it; even Telstra eventually shifted to a position of supporting it (Anon 8).

Interviewees reflected on the enduring popularity of the NBN, even after the ALP lost the 2013 election. Havyatt described the situation going into that election: ‘There was one famous strategy meeting of Cabinet where Stephen Conroy came out very, very distraught, because after the conversation they’d figured out the only thing we had left as a positive was the NBN’ (2014, pers. comm., 14 April). Notwithstanding multiple reviews into the NBN with damaging findings, the NBN still enjoyed ‘intrinsic support’ (Anon 21 2014, pers. comm.) with the Australian public (IBES 2014).

In light of democratic theory, EBP and the findings, the legitimacy of unchecked IM practice should be questioned – particularly in a democratic polity reliant on transparent, open deliberation. Democratic political theory (Bentham 1776; Locke 1821; Mill 1859; Rawls 1996) posits that the media act as a check on government power; and this is reflected in the way regulatory and policy regimes are constructed in many democracies. It is questionable, in light of the findings, whether the media – manipulated by the effects of IM practices – are able to perform this role adequately in the current environment.

The findings suggest IM can interfere with the creation of an authentic public-political space for unconstrained open communication. IM has been used to keep items off the agenda while actors seek to manage issues behind the scenes, or to neutralise issues at their source. This has been done by powerful actors protecting their interests, and ensuring the policy discussion stays within the bounds of options which support their strategic interests – confirming to some extent, in this case study, power theory espoused by Bachrach and Baratz (1962) and Lukes (1986). Arguably manipulation of the public policy agenda in this manner, depending on the severity, could compromise the essential functioning of a democracy.

Curran (2002, 2011) considered interactions between media, power and democracy at length, and this study draws on his work. In a liberal-pluralist model, Curran perceives democracy as a marketplace: a ‘process of competition between diverse interests and multiple power centres’, with a ‘free-for-all market approach to journalism that embraces advocacy and partisanship’ (2011, p. 80).

Macnamara (2012c), with reference to Curran (2011), considers common democratic models – deliberative, elite, liberal, representative, direct/participatory and radical – in the context of a discussion of social media and the public sphere. Macnamara notes the

concept of 'public sphericles which, while being seen negatively as social fragmentation by some, are also considered a viable alternative to a homogenous public sphere by others' (2012c, p. 3).

On the basis of the literature review and interview data, the Australian democratic model reflects elements of Macnamara's models, particularly deliberative, liberal and representative democracies (2012c). Reflecting the approaches taken by Baker (2001), Curran (2011) and Macnamara (2012c), this study combines elements of these models in interpreting the role of the media in Australian democracy, with an emphasis on the deliberative radical perspectives – which support a critical view of the impact of IM.

By facilitating information hiding in some scenarios IM can see a matter handled internally within an organisation, when citizen stakeholders could be entitled to awareness and knowledge of the event happening, and even a voice in how it should be managed. This is emphasised by citizen expectations under open data and open government policies in a number of jurisdictions (e.g. NSW).

Government faces the prospect of having to manage issues that involve heightened public expectations about issue outcomes. The public arguably expect the media to perform a watching role, and to reveal matters of concern to them.

To develop and implement policy, government needs to engage in IM in similar ways to corporate actors in the debate (Quinlivan), and if this is not done, resources can be unnecessarily diverted, and significant policy initiatives can be undermined – or they can fail at implementation.

This study has shown there is no level playing field in the policy process in Australia. Participants such as ACCAN, which are not backed by powerful corporate interests, can find themselves disadvantaged in the debate, depending on the nature of the issue.

Findings in this study support Dahlgren's view on citizen power in relation to corporate interests:

Citizens are further from the centres of economic decision-making, not just because the economy has become increasingly globalized, but also because the political elites, who ostensibly represent the citizens, have been losing some power relative

to the economic elites, as real power drifts away from representative and accountable democratic systems to the conglomerate corporate sector. (2009, p. 50).

Smaller entities' IM resources will be constrained by comparison with an entity such as Telstra, that is able to employ more staff, more senior issue managers, and expend additional resources on their IM capability. US and UK experiences also reflect this finding (McNair 2000).

However, the findings show that asymmetric power relationships between some in the policy debate are partly mitigated by democratisation of digital communications through social media, along with the potential for activist issue campaigns to use viral communication techniques.

Within these structural conditions, a savvy SIM approach can allow an activist organisation or an organisation with less funding to disproportionately influence the course of an issue in the public sphere. Smaller organisations have demonstrated their ability to achieve impact in the debate, as ACCAN did regarding the battery backup issue.

### **8.3.2 Practitioners**

This study has shown that practitioners in government, NGO and industry organisations are using IM. The initial definitions of "issue" and "issue management", developed on the basis of the literature review, have been found to be effective in determining what constitutes an "issue", from a practitioner and academic perspective.

For practitioners, this study shows examples of how IM practices can be and are used to influence public policy development processes, how and when these practices are effective, and which ones are relatively more effective than others – depending on the context.

This study shows that notwithstanding the US-centric nature of much IM theory, it still has applicability and value to Australian practitioners. This study supports the view that if PR and public affairs advisers do not already have an IM capability, they might well consider strengthening this area of their practice.

Findings on IM practices indicate that submissions are essential to engaging in public debate and to influencing policy, and practitioners should not miss opportunities to contribute well-crafted submissions to policy development and deliberative processes.

For influencing debate, findings indicate that events, providing media interview/comment, neutralising the issue cause, and providing information were all essential practices. To influence policy, practitioners in comparable scenarios would be advised, on the basis of these findings, to favour one-to-one briefings with influential stakeholders and policymakers (see **Appendix 21 – Practices and influences matrix**).

One-to-one briefings provide an opportunity for direct, in-person engagement, and the effectiveness of this practice aligns with communications theory, as it gives both parties an opportunity to clearly and directly convey messages and engage in a conversational interaction (Varey 2001).

Circumstances may create barriers for the effective use of in-person briefings, such as the availability of policymakers for meetings, and the potential need for “insiders” to help practitioners gain access to policymakers.

Findings in this study help practitioners identify policy opportunities – when circumstances create a scenario that opens a policy window (Kingdon 2002). This study shows that by combining SIM with policy strategy, a practitioner can take advantage of a policy window to progress an initiative, or create an environment where a policy window will emerge (e.g. Forman and the structural separation example).

Using IM practices, or at least being aware of how stakeholders are using them to influence a policy process, can help policy practitioners protect processes from manipulation, and strengthen EBP in policy development and implementation.

#### *8.3.2.1 Ethical IM*

The findings raise questions for practitioners, policymakers, governing bodies and industry associations such as PRIA and IABC, about how to ensure IM is being practised ethically. One approach is to consider regulations that constrain the ways public affairs issue managers and lobbyists can deploy IM practices. Other possible approaches include the use of “lobbyist registers” to enhance transparency, voluntary (or mandatory) ethical codes of practice, or wider education.

A number of Australian jurisdictions have lobbyist registers, for instance, at the federal level, in Victoria and in NSW. These are designed to enhance transparency among public affairs consultants, and to ensure that organisations cannot hire lobbyists who can act anonymously without transparent identification of their clients. Lobbyist registers, while assisting to address the influence of issue managers, do not fully address the democratic problem of their disproportionate influence on policy processes.

A challenge for issue managers in the use of registers is that frequently IM needs to be practised behind the scenes, and out of the public eye. Increased transparency has the potential to curtail the influence of IM – particularly in a public policy context, where policymakers may wish to project an impression that they are not influenced by IM. Heightened transparency, through the use of lobbyist registers, and declarations of interest, could also undermine the efficacy of some IM efforts.

IM principles could sometimes conflict with open government and open data precepts. However, IM can have a positive ethical impact on an organisation. For example, an issue manager can bring an issue that should be addressed – but would otherwise be hidden – to the attention of executive management, raising the issue’s profile so it can be addressed.

The data for this study also shows *persuasion* to be a common element of IM: whether internally, in the case of managing an issue before it moves onto the public agenda, or through media and communications practices, once it is a matter of public debate.

Ethical challenges in IM are underscored by PR’s uncomfortable relationship with persuasion: ‘the professional project of PR seems to stumble at persuasion, as it is hard to promote PR as a social good if its main activity, persuasion, is perceived as contaminated by notions of propaganda’ (Fawkes 2015, p. 105). This references PR’s potentially questionable role in the public sphere: Habermas views ‘persuasion as unethical due to the inequalities of interests between persuader and persuadee’ (2015, pp. 106).

Power and influence differentials may exist between persuader and persuadee (McKie & Munshi 2007) in the Habermasian public sphere, particularly where monied interests are able to employ PR or IM practitioners to effect persuasion.

In modelling ethical practice, Fawkes (2015) contends that the role of persuasion in PR must be acknowledged: ‘persuasion is endemic in our culture and without understanding its role in society and in practice, we cannot collectively evolve a grounded ethic’ (p. 106).

The PR industry in Australia is predominantly self-regulated, and membership of the PRIA is voluntary for practitioners (Macnamara 2012a). There is no legislative force or mandate behind the PRIA’s powers, and it cannot prevent an individual from practising. As a consequence, ‘many PR practitioners do not sign up to voluntary codes of practice and ethics’ (Macnamara 2012a, p. 413).

A voluntary code of IM practice could help to address some of the ethical challenges issue managers face on a day-to-day basis. Given the questionable effectiveness of existing voluntary PR codes of practice, such a code may have limited effect, but at least it would provide a guide for issue managers in an environment where a lack of guidance is made worse by reluctance to openly and frankly discuss IM in some areas. However, the subtlety and nuance of IM scenarios may be hard to capture in an IM code of practice, particularly balancing the interests of a client or employer organisation and stakeholders’ rights to open access to information.

The PRIA *Code of Ethics* (2015) does nothing to help curtail potentially manipulative elements of IM. This study’s findings suggest that IM should be incorporated into the PRIA *Code of Ethics*, or constitute the focus of an additional code or set of guidance for public affairs practitioners – particularly in a policy context.

In a corporate context, “Chinese walls” may be constructed to address some of the ethical dilemmas faced by communications professionals; but where there is a financial incentive to take on a new client or pressure to bill more, this may pose challenges for a practitioner aiming to meet billing targets.

In a public sector context, a question remains as to whether IM, in an era of open government (NSW Government *ICT Strategy 2012*), should be practised in an unfettered, unregulated manner at all. Alternatively, if it is practised, should it be publicly acknowledged, documented and even audited? As IM often occurs behind the scenes, there may be no record of an IM intervention for auditing purposes, particularly in a

government or public policy context where an officer may not wish to create a record that could be subject to a later disclosure request.

### *8.3.2.2 Education*

Another way to address potentially negative effects of unchecked IM on the public sphere is to educate PR and IM practitioners on ethical obligations, and to educate media consumers in PR literacy as a type of media literacy (Holladay & Coombs 2013).

This could help IM practitioners understand their ethical obligations, and their broader role in communications in a deliberative public sphere. Consumers of media could also more critically account for the influence of IM in public debate.

In an environment of fractured and diffuse public spheres (Dahlgren 2005), heightened influence of PR on media reporting (Macnamara 2014b), and varying levels of education among media consumers, it is a public policy challenge to maintain critical, independent reporting, and equally critical media consumption.

The loss of traditional media gatekeepers with the advent of 'prosumption' and the 'prosumer' (Curran, Fenton & Freedman 2012, p. 76) has arguably meant a proliferation of misinformation online, in an environment where brands and commercial interests can communicate directly with their target audiences. In the absence of critical media commentary, it is essential that the media consumer is educated about interpreting messaging and accounting for PR or IM influence.

If IM were disclosed and transparently reported to stakeholders, the media and the public, it could lead to controversy and reputational damage. An escalation could follow where issue managers go to greater lengths to "cover their tracks" as media consumers and the targets of their IM practices become more educated and aware of IM's use to manipulate the media and policy agenda.

Holladay and Coombs note:

A central concern to the unseen nature of public relations is that consumers of public relations messages often fail to understand that an issue originated from public relations and the inherent biases in the messages...

Public relations literacy would help people to recognize when they are encountering public relations messages, how to dissect those messages and how to create their own advocacy messages. (2013, p. 126).

Findings in this study on the prevalence of ‘providing information’ – which was the third most common IM practice discussed – reveal that many practitioners believe an open, honest approach can enhance the effectiveness of IM practices. Furthermore, three codes for the principle of being ‘transparent, honest’ were recorded under the ‘content’ and ‘message strategy’ parent nodes, which emerged in vivo from the data.

An empirical study of voluntary disclosures found that proactive, open disclosure of issues reduces perceptions of issue severity:

In the new media environment, people may expect greater transparency... the voluntary, proactive disclosure of corporate issues may offer practitioners key ingredients for developing strong relationships with publics – transparency and credibility. (Kim 2012, p. 87)

Providing information and providing reasons and explanation also appeared in summary data on the relative effectiveness of certain IM practices; practitioners perceived this approach as having a positive impact on debate, and on changing policy (see **Appendix 21 – Practices and influences matrix**). It follows that efforts to educate practitioners should emphasise providing clear, transparent information to stakeholders, along with noting the practical and strategic benefits of doing so.

Holladay and Coombs (2013) see a parallel with media literacy, outlined by Rosenbaum et al. (2008), Silverblatt (2009) and Potter (2011). In a social media context, Holladay and Coombs (2013) perceive particular dangers for media consumers ‘when its casual, informal content is mistaken for vetted content’ (p. 130).

PR literacy would also see an acknowledgement of the powerfully persuasive elements of PR. Holladay and Coombs view PR literacy as essential to ameliorating some of the potentially damaging effects of PR on democracies:

We have advocated for the further development of the concept of public relations literacy because of numerous potential benefits to consumers and democratic

society... We believe public relations literacy is important to individuals who seek to protect and to promote their own self-interests and to a society that values transparent democratic processes. (2013, p. 143)

Given the data in this study has shown that public submissions were a leading IM practice in the public policy debate, enhancing PR literacy and media literacy could encourage media consumers to look beyond superficial media reporting, and even to consider more in-depth content pertaining to submissions into policy processes. Overall, the findings in this study suggest the need for greater education in PR, media and IM literacy, to help protect media consumers – particularly as gatekeeper effects diminish (Birkland 1997; Soroka 2013).

The role of education extends to PR and policy practitioners and issue managers. Instilling an understanding of ethical practice can help establish boundaries for IM practitioners. Interviewees in this study did not highlight ethical challenges arising from their work – but they were not specifically questioned on this, and they would likely be reluctant to divulge any details of such challenges.

The findings in this study suggest a need to raise the profile of IM in educating PR, IM and policy practitioners, given IM's impact and the sensitivity and sometimes secrecy surrounding the practice. This could help new practitioners navigate their way through ethical questions they could face in practice, and it would serve to further align the practice of public affairs with societal and CSR expectations.

As has been demonstrated by this chapter, and the preceding chapter discussing the findings, IM has wide-ranging implications for the public sphere, society, and for practitioners. Journalists, practitioners and scholars are well advised, on the basis of this case study at least, to consider the sometimes invisible influences of IM in what otherwise may superficially appear to be a democratic, deliberative debate.

## **9. CONCLUSIONS**

This study has shown that IM plays an active role in the public sphere and influences public debate and policy, although direct evidence of chains of causation has been difficult to establish. This study shows, with detailed examples, that the course of NBN

policy development, from its inception, has been influenced along the way by IM employed by interests and stakeholders in the debate.

Chapter 2 – Definitions set out key terms used in the analysis, developing definitions for *issue* and *IM* that have been applied throughout this study. Chapter 3 – Literature Review surveyed the IM literature, with a focus on the phenomenon of IM, and a practice that is recognised in academic and practitioner literature on public affairs.

Chapter 4 – Theoretical Framework established the framework that has been applied to the phenomenon of IM. It reviewed existing understanding of PR's influence on the media, and set out the analytical lenses employed in this study: agenda setting, priming and framing. Chapter 5 – Research Approach, Methodology and Methods outlined the interpretivist approach adopted in the analysis, using a qualitative case study methodology, with in-depth interviews as the primary method.

Chapters 6 and 7 focused on findings, recounting salient results of extensive coding and data analysis across the primary NBN issues examined: cost (CBA), building the NBN (asbestos), national security (Huawei), digital divide, regulatory settings (structural separation), and content (copyright).

Finally, Chapter 8 – Discussion analysed the findings in detail, with reference to key IM theories and debates. Drawing on the literature review and theoretical framework this chapter outlined chains of IM influence in the public sphere, setting the findings against IM models and broader theory on the merits of EBP in democratic society.

## 9.1 Original contribution

Section 3.4 – The gap in knowledge identified gaps in existing IM research and theory, pointing to a paucity of rigorous research on the use of IM practice in a public policy context. In particular, there have been no in-depth qualitative studies in an Australian context examining *what* IM practices are employed, *how* they influence debate, *how* they influence policy, and the broader implications for policymaking, society and democracy.

The following summary table (3, overleaf) sets out the contribution this study makes to the fields of PR, public affairs, IM and policy – addressing the aforementioned gap in knowledge with reference to Section 5.1 – Research questions.

**Table 3. Summary of findings**

RQ	Finding	Type of evidence (at its highest)
1.	A range of IM practices are employed to manage public policy issues (see Figure 10 in Chapter 6).	<p><b>Direct</b></p> <p>While the term “issue management” is not always used, there is direct evidence of IM practices being employed in a public policy context.</p>
2.	IM practices were used in a number of different ways to influence debate in the public sphere.	<p><b>Direct / circumstantial</b></p> <p>A range of practices that meet the definitions of IM on the literature were evident in the study, and these were used <i>with the intention</i> to influence debate in the public sphere.</p> <p>The way these practices were used, and their impacts, often related to the issue type and context. There was circumstantial evidence in the findings of the IM practices influencing public debate.</p>
3.	<p>IM practices were used in a number of different ways to influence public policy. There were two major chains of influence:</p> <ul style="list-style-type: none"> <li>- IM practices influenced public debate, which in turn influenced policy.</li> <li>- IM practices influenced public policy more directly, such as through the use of submissions into review processes, or via one-to-one meetings (which were prominent in the findings).</li> </ul>	<p><b>Direct / circumstantial</b></p> <p>IM practices were used <i>with the intention</i> to influence public policy. However, evidence of effects on policy was often found to be indirect and circumstantial.</p> <p>In many cases interviewees could not establish that their IM practice <i>caused</i> a policy effect, although circumstances and broader analysis pointed to IM practices being significant contributors across the six primary issues tracked.</p>
4.	The practice of IM in relation to public policy issues has significant implications for public debate and democracy.	<p><b>Analytical, speculative</b></p> <p>Even if IM practices do not ultimately influence public policy, there is considerable evidence in this study (and in the literature) that they do set the agenda, prime and frame issues – often at the behest of special interests, retaining issue managers.</p> <p>Effects on democracy remain speculative, but the lack of transparency in relation to these often hidden influences is shown here to be a matter for broader debate in political, media and public communication literature.</p>

***RQ1. What practices are employed to “manage” public policy “issues”?***

Of the practices examined, ‘submissions’ were the most frequently referenced and coded IM practice. Other significant practices used to influence public policy debate and outcomes included ‘research’, ‘providing information’, in-person ‘meetings’, and providing the media with ‘interviews, comment’.

This supports a view that in regard to public policy issues, participants in the debate exploit formal review and government or parliamentary committee channels as a primary mechanism for influencing debate and policy.

***RQ2. How are these practices used to influence debate in the public sphere?***

The way the practices were used depended on the practice in each scenario, the broader IM strategy (including whether participants wanted to manage the issue behind the scenes or agitate for debate in the media), and how the issue manager intended to influence public debate on the issue (e.g. through promulgating a specific issue frame). The commonly coded practices were discussed with reference to specific examples in Chapter 7 – Findings – Influence of IM on Key Issues.

***RQ3. How are these practices used to influence public policy?***

As in the case of RQ2, the way the practices were used in specific instances depended largely on the IM strategy being employed – for instance, whether a confidential/private submission was made to a policymaker, or whether a more public approach was preferred, such as a public submission accompanied by op-eds and media interviews (as iiNet did with copyright infringement).

The decision to choose a public IM approach often depended on whether the organisation involved believed it could obtain a better result this way, whether the nature of the issue lent itself to a public debate, and whether there would be benefits to bringing public pressure to bear on the policymaker (e.g. the carriers and the SAU, and Optus’ submissions to the ACCC).

For RQ3 direct evidence of IM’s influence on public policy was not apparent in the data. In some instances policymakers acknowledged the role of IM and its influence on their

decision-making (e.g. Conroy with the CCC's work), but the extent to which a specific IM practice was the dominant factor remains difficult to determine.

***RQ4. What are the implications of IM in this context for organisations, the public sphere, societal interests and Australian democracy?***

Findings indicated there were times when interviewees expected IM practices to influence debate and policy, but they did not. A significant example is the enduring popularity of the NBN project, notwithstanding significant IM efforts to undermine it – which the data reflected. Measurability was a problem for most participants, who would frequently refer to having had influence, but were not able to definitively say they were the dominant influencer (Anon 10 from ACCAN).

This study shows that policy processes are influenced by factors going beyond those set out in commonly referenced theoretical models, such as the Davis Policy Cycle (Althaus, Bridgman & Davis 2013), and that these models do not adequately account for IM's influence. However, the range of IM practices discussed, and the differing ways in which they are employed, makes the creation of a single policy model problematic.

Given IM has influenced policy in this case study, on the basis of transferability across comparable scenarios, it is likely that IM influences public policy processes in other significant policy areas. Issue managers and those that retain them are not normally democratically elected, so public policy outcomes may be subject to undemocratic influences.

The issue of the digital divide has proven to be a significant component of the public narrative around the NBN. The way this issue has been primed and framed by stakeholders has been central to favourable reception of NBN policy by Australian voters; quantitative data confirms the issue's salience and qualitative data confirms the important role played by issue managers in influencing the issue's course on the public agenda.

Primary interview data, together with analysis of secondary materials, found that IM practices are not always successful, but that where they are, the organisation's reward can be a substantial influence over public debate and policy. Many examples emerged from the data, but two in particular are the benefit to smaller carriers from the structural

separation of Telstra (through activist IM by the CCC), and the benefit to all carriers with avoiding the imposition of a mandatory copyright regime. The impact of IM on the development and/or implementation of policy is significant – with organisations manoeuvring themselves into positions where they are better able to achieve their strategic objectives.

This study affirms the efficacy of IM practices, and demonstrates that they are more dispersed across roles throughout organisations involved in the public debate than previously recognised in much of the corporatist and PR literature.

In some instances interviewees did not describe their issue interventions as IM, but their practices were nonetheless IM practices on the basis of definitions set out in this study. This could also reveal a reluctance to acknowledge what is occurring inside organisations because of negative perceptions about IM. Data supports a view that IM is an essential capability for any organisation engaged in the public debate and seeking to influence policy processes.

A lack of structured IM was more pronounced on data from government interviewees, which supports the finding that government agencies often struggle with conceptualising and reconciling IM with their broader mandates, functions and transparency imperatives.

However, merely because a structured IM approach was not evident on the data does not mean it did not happen within agencies, given the finding that IM is distributed across roles. There may have been some – though limited – information hiding by participants, who for commercial-in-confidence, sensitivity or intellectual property reasons, may have been reluctant to divulge the specific application of formal IM processes within their organisations.

On the data available, there were some instances where a more structured, strategic approach, including preparing issue strategies, could have helped participants in the debate more effectively manage issues. For example, in the management of issues adverse to the NBN project (e.g. asbestos and CBA); in the approaches adopted by the ALP, and to a lesser extent, nbn and the DoC – with these last two constrained by their respective mandates and positions in the debate. In some instances government agencies

could save resources and re-focus their attention on delivering EBP through the use of enhanced IM practice.

Given the sensitivity of IM strategies in government agencies it was difficult to obtain detailed data on them – rendering findings on their efficacy problematic. However, data on IM in the private sector (e.g. Marshall from Alcatel-Lucent) demonstrated some strong examples of IM practice, which included many of the phases outlined in theoretical models – confirming their applicability.

Due to concerns about perceptions, staff in IM teams may be required to mask some of their work so it will not be publicly revealed as IM. This was evident in interview data with requests to “go off the record” when describing IM practices.

IM may contribute to a lack of transparency, where IM practices are somewhat invisible to deliberative policy processes. Opacity in the motives, backers and interests behind contributions to public debate makes it harder for media consumers and policymakers to accurately assess the arguments being promoted. Notably, the most prominent IM practice – making submissions – is usually part of a public process, contributing to the public debate; even an outlier on the data found submissions to be a moderately effective practice.

This study supports the view that the public submissions process, which is usually attached to an inquiry, review or committee, such as the *Senate Select Committee on the National Broadband Network*, is a key deliberative element of the Australian polity. It is also a process that could be made more accessible, for example, through facilitating targeted social media commentary and engagement.

## 9.2 Limitations

This study has some limitations, which partly derive from its interpretivist approach and qualitative methodology. The study was not seeking objective, generalisable findings, which could be perceived as a limitation from a quantitative, positivist perspective. Access and the sensitivity of IM, which sometimes involves commercial-in-confidence information, was an ongoing limitation.

Some significant connections, triangulations, and areas warranting further examination were evident on the data, but could not be published in this thesis. Due to their

sensitivity, the discussion also omitted some highly specific, direct examples of IM's influence. In some cases, the more direct the evidence of IM's influence, the more sensitive it became, and the less likely it could be included in the thesis. Nonetheless, this sensitive data was still fed into the coding and analysis for the study.

The heavy focus on interview data means this study relies, to an extent, on the openness of the participants. Corroboration, redundancy, triangulation, broader textual analysis and QDA software were used to mitigate any effects of self-censoring or information hiding that may have occurred on behalf of participants.

In most cases it appeared that interviewees were being honest and forthcoming to the extent they were able, given contractual, commercial-in-confidence and sensitivity requirements pertaining to their current or former roles. However, it can be assumed that there would have been IM practices, or specific instances of their use, where they may have had significant influence – but these were not, for various reasons, disclosed during interviews.

For example, if an IM practitioner personally knew a policymaker or had some connection to the policymaker affording the practitioner access, s/he could phone the policymaker and put forward a case persuading the policymaker of the merits of a particular course of action. Such an instance would probably not be disclosed to the researcher, to protect both the IM practitioner and the policymaker. However, it would be a valuable data point. It is not clear how, in a study using voluntary interviews, this limitation could be overcome.

In many cases factors that could have skewed findings were likely to have balanced out. For example, it would be in issue managers' interests to discuss and promote the effectiveness of their work, which would mean a tendency to *over-represent* the effectiveness of IM. Equally, in most cases sensitivities about giving accounts of a direct IM influence created a countervailing imperative to *under-represent* IM's effectiveness, or to omit crucial facts that would help to close the influence loop.

The study is necessarily limited by the standard doctoral timeframes, access to issue manager interviewees within organisations, and by the complex and generally sensitive

subject matter, where a researcher would expect a bias against full disclosure of IM practices and their effects.

The limitations discussed here would arguably all be present in any ethically sound study of IM. Everything that could have been done to mitigate the limitations discussed here was done, and so on balance these limitations did not significantly affect the findings, analysis or outcomes of the study.

### 9.3 Further research

This study identifies areas recommended for further research:

- How understandings from this case study, involving the ICT policy debate, can be applied to other public policy fields, and in other jurisdictions (using transferability).
- Practical, evaluated models of IM that Australian practitioners can readily apply in a public policy context, building on the process models examined here (see **Appendix 5 – Issue response models**).
  - Which types of issues are best managed using which types of IM practice? (No obvious patterns emerged from QDA in this study).
  - Better understanding of scenarios where IM is not effective at influencing policy.
- Modifying IM models for application to social media ‘issue contagions’ (Coombs 2002, p. 216), especially in light of different views of the representativeness of debates in social media spaces (e.g. Anon 19 cf. Rhodie).
- The developing interconnectedness of IM, CM and RM, and how this will affect the future course of IM, public affairs scholarship and risk communication.
- How the deployment of IM may influence the future evolution of the public sphere.
- Reliably measuring IM against its goals and objectives.

Interview data and analysis confirms that IM’s influence is not fully “measurable” or attributable via evidence in public policy context. This is partly due to information hiding by parties to the debate, the lack of measurement in the industry, indirect causation, and the limited availability of clear IM metrics.

Applying strict evidentiary standards, to close the influence loop and obtain direct evidence of IM's impact on policy, would require a journalist or a policymaker to concede that their actions resulted solely from an issue manager's intervention. It would not ordinarily be in an interviewee's interest to report that a direct and sole influence caused his or her actions.

If a policymaker did report this, it may be unreliable – it is unlikely they could say their own earlier decision was made purely on the basis of one factor, as they may be unconsciously influenced by messages from myriad sources in relation to the issue. Many of these would have been IM influences – the true nature of which may have been deliberately obscured by the issue manager. It could be argued that no human action can be assessed as being caused by one factor alone, and certainly not subjectively assessed as such by the individual who took the action.

So even if interviewees were asked to identify the extent to which a specific IM practice was a factor in their decision-making, it is unlikely their self-reporting would be reliable. It follows that to require direct evidence of the influence of IM may be an impossible standard, and if this view is accepted, then the circumstantial evidence attained in this study is as good an indication of these influences as the chosen research design will allow.

The preceding discussion assumes perfect honesty on behalf of participants. However, if a journalist or policymaker could truly know the reasons for their own decisions, it is unlikely they would admit an issue manager influenced them.

For a journalist, this could raise questions about his or her professionalism, integrity and independence. For a policymaker, it would constitute an admission to a policymaking process being unduly or disproportionately influenced by a specific stakeholder or interest – which could have political, legal, commercial or reputational consequences for the policymaker. Neither the journalist nor the policymaker is likely to make that admission.

An exception is where a journalist or policymaker was influenced by IM, but that IM was used to emphasise an argument in the debate – which the journalist or policymaker considered a legitimate component in their decision-making.

On this basis, there was evidence closing the influence loop in Figure 11, with Conroy, in his policymaking role as Minister for Communications, confirming the influence of IM practices outlined by other participants in the debate. Two examples were Anon 10 (ACCAN) influencing policy on battery backup, and Forman (CCC) influencing the structural reform debate. In both scenarios, IM exerted a positive influence on the debate and on the ultimate policy outcome, in the view of the participants.

In a government context, issue managers may not want the “tools of the trade” to be understood and their effects to be easily reproduced. It follows that to demonstrate a direct causal relationship, showing an IM practice causing a specific result, especially in a government context, could undermine the future effectiveness of IM practice in that niche area.

Although commentators have viewed the NBN as having the potential to reduce the digital divide, this research indicates this potential is unlikely to be fully realised, as powerful elites, operating self-interestedly, and employing IM capabilities, have sought to influence key NBN policy settings.

IM does not exist in isolation within an organisation – data in this study supported the view that it needs to co-ordinate with project management, strategic management, RM and CM functions in order to maximise its effectiveness.

By being integrated, and facilitating successful policy development and implementation outcomes, IM can make a greater contribution to the running of an organisation, and help the organisation make a broader CSR contribution to the community in which it operates.

An interesting finding of this study has been that despite continued attacks on the NBN, and arguably a series of reviews that were motivated by IM and political purposes, the NBN has remained electorally popular (IBES 2014). Enduring public support for the NBN is even more surprising in light of apparent bias against the NBN in the public debate, from media organisations and journalists (IBES 2014), and from News Corporation (Forman).

This example reveals some of the limitations of IM and the difficulty in predicting its effects. It demonstrates the latent strength of democratic and deliberative checks on proposed policy changes (in this case abandoning the NBN project altogether) – where

these are not supported by evidence, and where there is persistent public or stakeholder support for a policy or project.

The findings in this example highlight the importance of situation and issue analysis, stakeholder mapping, public opinion and political/voter analysis, EBP impacts, and assessing the strength of countervailing forces – all as part of SIM.

The forces rallied against the NBN were powerful and extensive, and this was matched on the ALP side by not fully selling the benefits of the NBN (Dalby, Stanton). This example demonstrates a level of robustness in the deliberative public sphere. Australian voters will perceive a strong policy idea as worthwhile: there is an NBN in Australia, albeit one using a MTM rollout model.

While this example highlights IM's limitations, the counter position is that the NBN itself came about through modified activist IM – going back to initial meetings and the 'policy seminar' arranged by the CCC (Forman 2014, pers. comm., 20 May), along with the development of a policy paper (Conroy). This is a convincing example of the effectiveness and importance of IM in setting the national public policy agenda.

This study has shown that IM not only has the potential to powerfully manipulate the public agenda and influence the decisions of policymakers, but that IM also suffers significant limitations in the face of a strong policy proposal, or in the face of public policy with enduring popular support or a solid EBP foundation. Combined with difficulties in measurement, IM sometimes suffers problematic unpredictability in its policy impacts.

The current Liberal Government argues that its MTM NBN will be cheaper and arrive faster (Liberal Party 2013b). On one analysis, the forces ranged against the NBN succeeded: they laid the groundwork for the shift to an MTM – which could be viewed as an inadequate national broadband model when set against projected future growth in the demand for data and higher bandwidth (Vorst et al. 2014).

On this reading IM was instrumental in compromising the most visionary infrastructure project in Australia's history, and was not sufficiently used to defend FTTP. However, that is a question on the merits in the FTTN vs FTTP debate, which is not the focus of this study.

IM was used to place the NBN on the national agenda, which subsequently determined the federal election results in 2010. This study takes the position that the NBN being rolled out is still an underlying success for the initial proponents of the NBN, including the CCC, for whom it was a means of addressing market failure.

Some interviewees noted that the NBN reviews discussed in this study enabled the Liberal Government to effect shifts in NBN policy after coming to power in 2013, moving to an MTM model with the support of apparently independent, external findings: ‘Malcolm Turnbull has quite cleverly... used a series of external party reviews to allow him to sort of shape his policy’ (Anon 9 2014, pers. comm.).

A counterpoint is that a review’s political purpose may also be a democratic purpose – given the Liberal Government was democratically elected. This nonetheless raises concerns about whether such review mechanisms are being undermined, with their long-term value as deliberative processes diminished.

A tension exists for policy and IM practitioners in government between the *technocratic* and the *democratic*; this was evident on data from nbn interviewees. Policy practitioners in government have a democratic imperative to support the implementation of policy mandates ushered in through electoral mechanisms. However, the new government policy may not be supported by sound principles of EBP (technocratic elements).

Interview data demonstrated the use of research to support arguments in the debate (as with the CBA, or uses of the NBN). It follows that more powerful and wealthy interests in the debate could secure more respected and experienced researchers or reviewers to prepare work that underpins their arguments. High quality research may be costly and potentially beyond the resource capacity of some smaller organisations (e.g. Hutley and the MRA).

Studies have shown that PR practitioners (often using IM practices) are able to influence the media (Macnamara 2014b), and that the media in turn can influence the public agenda – including policy and voting outcomes (McCombs 2014). Interview data supports this finding, as outlined in Chapter 7 – Influence of IM on Key Issues. The diminution of independent, critical journalism reflected in the literature and recent studies (Macnamara 2014b) suggests a growing impact for IM as the editorial gatekeeper role declines.

Furthermore, the social media findings suggest that agenda setting, priming and framing can be exercised with greater impact where stakeholders are able to directly communicate with target publics using social media or online channels.

One example of this is the blog by Malcolm Turnbull (2014c), Minister for Communications, which facilitates direct communication with stakeholders, and appears influential (on interview data). Interviewees (including Rhodie) found direct communication in social media environments to be effective, and referred specifically to Turnbull's blog. However, other interviewees queried the representativeness of social media platforms like Twitter (Anon 19).

Findings suggest that social media may not be the best place to engage in public deliberation on complex policy issues, supporting Macnamara (2012c). Given reference to the democratic potential of social media as a new deliberative sphere, data for this study suggests that social media is a fractured space where audiences' existing views can become entrenched, and interviewees regarded debates in these spaces as being unrepresentative of broader views, on balance (e.g. Anon 19).

The relatively rigid IM lifecycle and BPI models developed and referenced in this study (Palese & Crane 2002b) can only provide a guide to the practitioner aiming to employ an IM strategy in a public policy context. It is likely, given the complexity of the public policy issues examined here, that a bespoke approach would usually be required to successfully alter the course of an issue.

Data indicated differing views on the nature of IM; some interviewees saw IM in terms of stakeholder (Dalby) or media management. The process of conducting this study revealed that IM's reputation is not always favourable: requests for interviews were sometimes met with avoidance and trepidation. Ironically, this suggests IM itself may be in need of skilfully deployed IM to repair its reputation.

A general initial reluctance at the political level to engage with this project, even though the project is not focused on the merits of the NBN, could be indicative of negative perceptions of IM, and a view that its practice should remain secret – not constituting a proper subject of study and in-depth investigation. Some of this could relate to the

tendency to associate IM with PR spin, and the ‘demonisation of political public relations’ (McNair 2000, p. 122).

Understandably, government agencies struggle with IM: a number of participants in the debate, working in agencies that have been closely involved in NBN policy development, were deeply spooked about the prospect of participation in this study. This could be for fear of repercussions from political offices – which would be a concerning scenario, or potential embarrassment to agencies or politicians if the extent of IM in some policy areas is revealed.

This study highlights the value of IM where it can help achieve a net beneficial outcome for an organisation and its stakeholder publics. Use of IM practices could help protect agencies delivering policy programs from unnecessary diversion or potential failure, which does not serve the public interest. In this sense IM can advance societal interests where it is used by a legitimately mandated organisation to deliver EBP or in co-operative partnerships with vested corporate interests – where the partnership furthers the policy objectives.

Early IM intervention can avert damage to an organisation’s reputation, and also help align its conduct with the public’s expectations of how it should act – closing any prospective legitimacy or expectation gap early in the issue lifecycle. In this way the issue manager can be a type of organisational conscience, which underscores the need for the issue manager to have C-level access within organisations in order to be effective.

Maintaining best practice IM is arguably central to strong CSR practices. An obvious example is in a situation where an organisation could do environmental damage, but an issue manager identifies the potential problem early. Neutralising the underlying cause of the issue (evident on interview data as an effective IM practice with eight codes), stopping or preventing the environmental damage, is beneficial for the community and environment from a CSR perspective, and is also in the organisation’s own strategic, reputational and legal interests.

The findings show that effective IM has the potential to prevent public debate and/or political focus being diverted away from substantive issues (Quinlivan) towards minor

issues, taking up the time of government officers and distracting them from program delivery.

IM can help avoid situations where trivial issues become disproportionately represented in the public debate – perhaps through sensationalist or inaccurate media reporting, which can reduce the quality of public deliberation. However, triviality is a subjective assessment, and a member of the public or stakeholder may not see an issue which is consuming agency resources as trivial.

Managing minor issues, beginning with environmental scanning, intelligence gathering and preliminary issue analysis, means organisations can limit the diversionary impact of these issues. Activist IM can be employed to exacerbate these issues, but the organisation can also use IM to manage and limit the damage inflicted.

This study has found that IM can have both positive and negative societal impacts, based on its context; for example, IM can be used to advance an organisation’s legitimate interests in the debate. This study shows that although IM also has manipulative elements, whether there is a net positive policy outcome in a particular instance that achieves greater social utility, will depend on who is using it, and for what purpose.

Practised by organisations with a legitimate mandate to set or implement EBP, aimed at “the greater good”, IM is arguably socially beneficial. However, another organisation may use IM to knock public debate off course (which is also a subjective assessment), and divert it away from an EBP outcome with the potential for social disbenefit.

Government agencies could be at a disadvantage when responding to activist IM of this type – they would be restricted in the extent to which they could use IM to respond to the issue, particularly in controversial, politicised and highly scrutinised policy delivery areas.

This study has potential transferability (Shenton 2004; Lietz & Zayas 2010) to like instances, where vested interests could manipulate public sentiment on significant policy issues, with a consequent impact on policy development and implementation. This could lead to EBP failures in key areas that underpin Australia’s long-term economic, social and cultural development.

Given the frequently hidden nature of IM, understanding the extent of its influence on policymaking and curtailing this influence (where necessary, on ethical or utilitarian grounds) would be a formidable challenge – and one that is arguably beyond the capacity or intent of any existing regulatory authority or independent professional body in Australia.

This study raises questions about the susceptibility of the policymaking process to influence from vested interests, in the current and recent public affairs environment, and the Australian polity's ability to deliver major infrastructure projects for the utilitarian benefit of future generations in a cost-effective manner. The way NBN policy issues have been primed and framed in the debate by the discussants creates some doubt about whether the final outcome will be a success, and whether the NBN that this democracy delivers will serve the long-term best interests of the Australian people.

## APPENDIX 1 – IM case study comparisons

This study is informed by significant IM (and CM) case studies in the literature, where these have identified current best practice. In identifying the techniques employed by issue managers for this study, it is instructive to have regard to comparative best practices as part of the broader theoretical foundation for this study – particularly where these comparisons help demonstrate the relationship between CM, RM and IM.

Contemporary Australian IM examples can be found in communications management after the devastating Canberra Bushfires of 2003 and the Victorian Bushfires of 2009, and the Fonterra, DaimlerChrysler, and Federated Farmers of NZ examples.

### Emergency management

Both bushfire examples have been the subject of IM and CM study. In the tragic events of these bushfires four people lost their lives in the Canberra fires, and 173 lost their lives in the Victorian bushfires. Both fires provide points of comparison against the larger NBN case, with IM being used after the crises to help communities recover. This required application of modified public communication practices with an IM component (Nicholls & Glenny 2005).

In Victoria the Labor Government faced numerous public affairs challenges, which worsened as each day of the Royal Commission heard evidence about emergency response management failures. Senior executives from first responder agencies would typically give evidence, and then have to resign, and this occurred with Christine Nixon (former Chief Police Commissioner) and Russell Rees (former Country Fire Authority (CFA) Chief).

The Victorian Government employed techniques in an attempt to manage issues as they were raised in the Royal Commission and the public sphere, focusing on the Victorian Government's response during the bushfires. Galloway and Kwansah-Aidoo (2012) posit that the Victorian Government, as part of its post-bushfires communication strategy, sought to 'present the government's response as timely, appropriate, and effective in the circumstances' (p. 281). They further sought to:

- Present problems as systemic rather than owing to individual organizational failures.
- Position the disaster as so overwhelming as to exceed the limits of reasonable planning and preparation.
- Direct attention to the future while aiming to be seen as making an effective response in the present. (2012, p. 282)

In their assessment of this approach, Galloway and Kwansah-Aidoo note that 'the Brumby government's response may have contributed to its defeat at the state election in November 2010' (p. 284), also commenting on the delay in an apology being issued.

From an IM strategy perspective, where a State Government oversees a disaster of the magnitude of the Black Saturday fires in Melbourne, it would be hard to envisage an IM approach that could see that government win an election late the following year. This is partly recognised in Galloway and Kwansah-Aidoo's later discussion, where they note the difficulties policymakers face in developing and achieving compliance with government policy in extreme natural disaster environments.

Policy failings arguably contributed to the events of Black Saturday, with the Victorian "Stay or Go Policy" being criticised in the public debate (*The Age, Herald Sun*) and in discussions in the Royal Commission. This was acknowledged in the shift to a "Bushfire Safety Policy" which emphasises leaving early as always the safest option, and refocuses the primary goal of the policy on protecting life. The Royal Commission recommended the following changes to the Stay or Go Policy:

[7.1] The CFA revise the publications and programs by which it communicates with the community about preparing for bushfires and what to do in the event of a bushfire to:

- clearly convey the following principles:
    - the safest option is always to leave early rather than to stay and defend,
    - not all homes are defensible in all circumstances and householders are advised to undertake an individual assessment of defensibility,
    - unless a property is defensible the advice is to leave early...
    - the risks of staying to defend include the risk of physical injury and death.
- (Teague 2010, p. 203)

In a public policy environment, the Victorian Government faced difficult decisions in the face of a range of stakeholders which had different viewpoints on how to protect Victoria from a situation like Black Saturday recurring in the future.

Other significant issues that had both policy and public affairs dimensions included fire refuges and communities and individuals wishing to rebuild in locations that would inevitably be dangerous during future bushfires – both topics of discussion and recommendations from the Royal Commission. These IM challenges were exacerbated where political promises, such as to rebuild endangered communities, did not meet the standards of sound policy judgement.

In this scenario complex policy negotiations delayed a government response to some Royal Commission recommendations, creating public affairs issues where new policy deliverables had not been completed in time, which would invariably lead to media criticism in an environment of hostility towards the Victorian Government.

In their analysis of the ACT Government's bushfire recovery response in 2003 Nicholls and Glenny referred to an adapted Hallahan (2000) model to help map relevant stakeholders (Table A1 overleaf).

**Table A1. Modified Hallahan model**

<i>Levels of 'being informed'</i>	<b>Low involvement</b>	<b>High involvement</b>
<b>High knowledge</b>	Aware publics	Active publics
<b>Low knowledge</b>	Inactive publics	Aroused publics

*Source: Nicholls & Glenny (2005, p. 44)*

This approach was also applied in Victoria to understand stakeholders during recovery and for IM during the Royal Commission, although it was found to be overly simplistic and not as useful as would be expected from the literature. This may be due to its bluntness, whereas a more detailed stakeholder analysis (e.g. Rawlins 2006) would capture more nuance. Nicholls and Glenny (2005) also refer to the use of an 'issues register', which was employed by the ACT Government Taskforce to track and manage issues during the recovery.

### **Fonterra**

A worthy comparative example from recent experience, that demonstrates the link between IM and CM, is the Fonterra food safety crisis in 2013 involving a food recall and a company's response to a botulism scare. This was accompanied by an investigation into the CM readiness of Fonterra and its response, which culminated in a report being provided to the Fonterra Board in late 2013 (Hallman, Cuite & Wu 2013).

The Fonterra report included a recommendation that best practice requires having a 'permanent, multi-disciplinary group Incident Management Team (IMT) whose role it is to assess emerging issuers for their potential to develop into critical incidents' (Hodder, Trainer & Heida 2013).

Griffin (2014) contends that key competencies for a practitioner working in an IMT are: flexibility, outside-in thinking, solution focus, objectivity, empathy and influencing (p. 188). Notably, data from this study did not reflect the widespread use of IMTs in an Australian context. Palese and Crane use the terminology of the 'issue process steward' who is:

...either an individual or a department – [that] serves as a bridge between issue managers and senior management. The process steward does not manage issues, per se, but does work closely with issue managers to facilitate collaborative communication. (2002c, p. 4)

Among other tasks, Palese and Crane say the steward's job is to:

- nurture and develop the IM process

- oversee and maintain competency in IM through training and providing relevant resource materials
- begin to “connect the dots” from a network of internal and external resources to recognize and stimulate awareness of emerging issues
- facilitate dialogue among issue managers
- service as a “one stop shop” for those who need insights on the enterprise-wide issue landscape, and
- ensure that resources are available for IM as appropriate. (2002c, p. 4)

Additional analysis of Fonterra’s use of social media for crisis management is discussed at **Appendix 23 – Social media IM.**

### **DaimlerChrysler**

An additional example is that of DaimlerChrysler’s IM approach, posited by Palese and Crane (2002b, p. 285) as indicating best practice. The ‘overall goal of the process is to identify issues as early in their life cycle as possible’ (2002b, p. 285). The emphasis is on intervening in the development of an issue before it crosses the “public threshold” – the point at which the issue becomes public, and moves beyond the organisation. Interview data reflected the importance of this approach, with Marshall (Alcatel-Lucent) noting specific examples where issues were managed so that they did not reach the media in a corporate environment.

### **Federated Farmers of NZ**

Finally, another simple IM case study example can be found in Roper & Toledano (2005), with the Federated Farmers of NZ scenario (below).

In 2002 the Federated Farmers of NZ (an industry association) launched a successful issue management campaign to influence Government policy, and stop the imposition of a livestock emissions (methane) levy. Stakeholders included the Labour Government, opposition parties, farmers and the ‘general public’.

In their campaign the association directly lobbied politicians to change policy. They supported the opposition to worsen a perceived ‘legitimation gap’ between the Government and the voting public. They initially issued a media release, criticising the Government’s policy, and positioning the association as concerned about the interests of all New Zealanders. They worked with the leader of the opposition, also a farmer, who subsequently delivered messages supporting the association’s position in speeches – in one case resulting in a spontaneous rally by farmers.

The association issued further media releases, employing framing and making ‘strategic changes’ to messages as the campaign developed. It assisted branch members in directly raising their opposition with politicians, and used ‘political speech’ to ‘incite’ its members to protest. It also organised a successful farmer petition against the policy.

## APPENDIX 2 – Definitions summary

Term used	Definition	Source
Agenda building	‘A collective process in which media, government, and the public influence one another in determining what issues are considered to be important... the process of putting an issue on the public’s agenda takes time and goes through several stages.’	Severin & Tankard 2001, drawing on Lang & Lang 1983.
Agenda setting	<p>‘The public uses... salience cues from the media to organize their own agendas and decide which issues are most important. Over time, the issues emphasized in news reports become the issues regarded as most important among the public. The agenda of the news media becomes, to a considerable degree, the agenda of the public... the news media largely set the public agenda.</p> <p>Establishing this salience among the public, placing an issue or topic on the public agenda so that it becomes the focus of public attention and thought – and, possible, action – is the initial stage in the formation of public opinion...</p> <p>...News media may not be successful in telling people what to think, but they are stunningly successful in telling people what to think about.’</p>	McCombs 2014, p. 2.
Frame	‘...as a property of a message, a <i>frame</i> limits or defines the message’s meaning by shaping the inferences that individuals make about the message. Frames reflect judgments made by message creators or <i>framers</i> .’	Hallahan 1999, p. 307, italics in original.
Framing	‘To frame is to select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation for the item described.’	Entman 1993, p. 52.
Issue	<i>An unsettled matter, condition or event, internal or external to an organisation, which has the capacity to have a significant impact on the functioning or interests of the organisation.</i>	Developed from multiple sources.
Issue management (IM)	<i>The marshalling and deployment of organisational resources, successful or otherwise, to influence the development or course of an issue that has a public policy dimension – through media representations and/or other means – in order to achieve an outcome in the instigator’s favour.</i>	Developed from multiple sources.
Priming	‘Priming suggests the criteria and standards by which issues should be judged.’	Macnamara 2014a, p. 137.

## APPENDIX 3 – Issue lifecycle comparisons

(Bridges 2004, p. 62)

<b>Theorist</b>	<b>Pre-issue</b>		<b>Awareness</b>			<b>Final</b>
<b>CORPORATE ISSUES</b>						
Center & Jackson (1995)	latent		emerging		hot	fallout
Coates et al. (1986)	development		politicisation		legislation/regulation litigation	
Ewing (Heath 1997)	public dissatisfaction	name to dissatisfaction	media coverage	pressure group awareness	legislative discuss/action	
Hainsworth (1990a)	origin		mediation/amplification	organisation	resolution	dormant
Heath & Nelson (1986)	strain	mobilization	confrontation	negotiation		resolution
Sethi (1979)	pre-problem		identification		remedy/relief	prevention
van Leuven & Slater (1991)	awareness	elaboration	understanding	attitude crystallisation		readiness/action
<b>SOCIETAL ISSUES</b>						
Cook & Skogan (1991)	ripe issue climate	multiple voices	legitimisation	policy specifications program development		off agenda
Downs (1991)	pre-problem	alarmed discovery/euphoria	realise cost	decline of public interest		post-problem
Foote & Harte (Price 1992)	problem	proposal	policy	program		appraisal
Hilgartner & Bosk (1988)	incipiency	coalescence	institutionalisation	fragmentation		demise

## APPENDIX 4 – Crisis and risk management

### Crisis management

Fink's Crisis Lifecycle model (1986) is instructive in building an understanding of the interaction between IM and CM, and in teasing out elements of the continuum between the two. Fink puts forward four stages of a crisis, using a medical analogy:

1. prodromal crisis
2. acute crisis
3. chronic crisis, and
4. crisis resolution.

Of note is the concept of a 'trigger theme' (Howell 2003, p.2, also in Sturges 1994), with Howell proposing the following definition:

Trigger themes represent repeated messages or pointers that if recognized, may help the organisation to implement activities intended to anticipate a crisis and exploit its benefit or reduce its negative impact. (2003, p. 14)

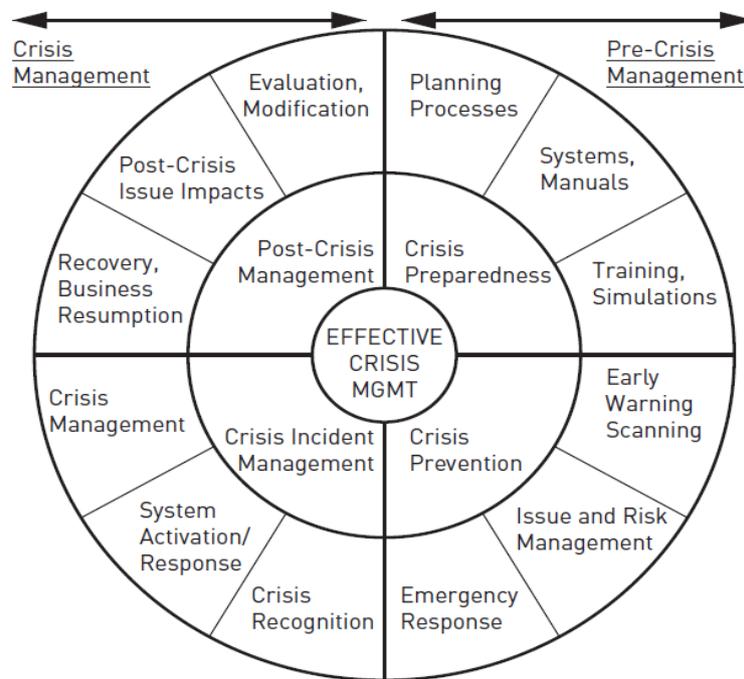
Public affairs advisers are able to intervene at an early stage, using techniques of agenda setting, priming and framing, to help influence the further development of these initial trigger themes in the mass media (Howell 2003). Components of these trigger themes include blame and responsibility, which can be affected by the framing of these themes in the media.

Howell notes in a discussion of Pinsdorf (1999) that 'early warning signs typically appear in mass media coverage raising the public awareness of a topic' (Howell 2003, p. 40). From an IM perspective, interview data and content analysis has shown that these early warning signs may also begin entirely within the organisation, and may not appear in the mass media. In this sense the early warning signs concept can be adapted to inform IM theory, enhancing the sensitivity of an organisation's situation analysis and environmental scanning capability.

The later development stages of an issue may manifest as a trigger theme under Howell's model, supporting the view that IM and CM appear along a continuum (Jaques 2009). From the earlier examination of issue lifecycle models and Fink's Crisis Life Cycle model, an issue can emerge internally within an organisation before it reaches the prodromal crisis stage.

Often IM may be more subtle and unseen than CM, with IM keeping an issue out of the mass media and public debate, or ensuring it appears with frames such that it is not cast as an issue, but instead, for example, as a positive news story.

Theorists debate the relationship between IM and CM, with Heath (2009) taking the view that CM forms part of IM, a view not reflected in Jaques' endeavours to clarify the relationship in his 'Issue and crisis management relational model' (2014, p. 14) reproduced in Figure A1 (below).



**Figure A1. Issue & crisis relational model**  
*Source: Jaques (2014, p. 13)*

Nonetheless, Fink's model, and identification of prodromes and 'triggering events' (Howell 2003, p. 59), shifting a crisis from the prodromal stage into the acute crisis stage, can inform an understanding of the later stages of issue development.

Many factors could be driving a practitioner shift from a theoretical notion of IM to a more practical CM approach. One may be that it is easier to persuade clients to pay for advice that directly aids in averting a crisis, by comparison with advice that merely helps to avoid an adverse issues development. Meanwhile, practitioners know that what they are applying are the principles of IM. CM also carries a sense of urgency which IM lacks.

Recent US writing (Kim & Kim 2010) reflects the role of fear in motivating clients to engage PR consultants. They found the effect to be most profound in engaging CM and IM advice. In a climate of corporate austerity, presenting the dangers to an organisation of not engaging in IM in the context of a possible crisis may be more productive for a consultant and be more likely to lead to the client agreeing to engage the consultant's services.

The link between IM and CM, and the continuum approach, supports this “sales pitch”. The difficulty explaining the nature of IM to a prospective client – reflected to some small extent in the definitional difficulty encountered in IM – may impact on its perceived usefulness and applicability in a corporate, and even more so in a government context. The use of language around the practice of IM invariably influences the academic development of the discipline, and this is evident in the work of Palese and Crane in their association with the IMC.

It may be easier for practitioners to explain and promote the value of CM to executives – by comparison with IM. In a commercial environment primary motivators can include the need to protect the organisation’s reputation and the CEO’s personal reputation, while balancing cost pressures, so that any expenditure on CM or IM must be justified to an Executive Board.

If the discussion can be presented in the context of avoiding a crisis, a practitioner may be able to gain more traction with his or her audiences inside an organisation. Many managers also understand the language of RM, which they are often familiar with regard to corporate strategy – and this was reflected in interviewee recognition of RM and its links to IM.

This chapter has set out the elements of the theoretical framework of IM, also considering its relationship with RM and CM. This theoretical framework forms the foundation for the IM practices examined in the study, as they occur within a mediated public sphere, where policy actors use agenda setting, priming and framing in an attempt to influence the course of debate.

### **Risk management**

Some authors note the importance of risk to management of society, reasoning that society organises to manage risk collectively (Beck 1999; Douglas 1992). In this sense, it could be speculated that society aims to manage uncertainty, and this raises questions about the role of IM in helping society to achieve this. A certain level of risk is arguably unavoidable in corporate or government public affairs. IM helps reduce the impacts of a negative outcome from an issue, and so can help agencies manage overall risk and uncertainty.

Like the continuum between IM and CM, RM plays a role in the IM process, particularly in the issues analysis phase. Commentators (including Heath & Palenchar 2009) have posited that issues, risks and crises could form the three corners of an ‘analytic triangle’ (Heath 2013, p. 393), and the role of RM is prominent in Jaques’ most recent IM writing (2014).

Galloway (2007) notes the importance of communication to RM, ‘communication is central to all such efforts if risk management is to achieve its objectives, which centre

around identifying and assessing risk, then developing and implementing appropriate mitigation strategies' (p. 16).

Galloway, in his discussion of risk communication, writes that 'no longer will publics put up with risk messages being thrust at them by expert sources whose assumption is that "if you knew what I know, you'd think the same"' (2007, p. 24), which bears direct application to analysing the Huawei and national security issue.

From a public policy perspective, taking account of reputational damage for a government agency, this scenario can lead to the removal of the CEO or Director-General (in the NSW Government scenario), or to a change of government in a more extreme scenario.

Corporate image advertising, taking an agentic approach, arguably has four aims (Garbett 1981, p.13):

1. To educate, inform, or impress the public with regard to the company's policies, functions, facilities, objectives, ideals and standards.
2. To build favourable opinion about the company by stressing the competence of the company's management, its scientific know-how, manufacturing skills, technological progress, product improvements, and contribution to social advancement and public welfare; and, on the other hand, to offset unfavourable publicity and negative attitudes.
3. To build up the investment qualities of the company's securities or to improve its financial structure.
4. To sell the company as a good place in which to work, often in a way designed to appeal to college graduates or to people with certain skills.

Some of these aims are common to government agency communications, and many agencies focus on a need to inform the public about government policy, or in the example of a behaviour change campaign, the beneficial goals of the campaign are often deliberately tied to the branding of the agency.

Aims 2 and 4 outlined above are also aims which government agencies seek to achieve. Government agencies in particular stress their roles in social advancement and their contributions to public welfare as part of broader campaigns, and in line with the expectations of citizen stakeholders (Perrott 1996).

This research supports the view (echoed in Heath 2013) that issue and image communication, although occupying different theoretical and practical spaces, overlap. O'Connor defines reputation management as 'the strategic use of corporate resources to positively influence the attitudes, beliefs, opinions and actions of multiple corporate stakeholders, including consumer, employees, investors, and the media' (O'Connor 2005, p. 745). Applied in the NBN and government context, this definition withstands scrutiny

and helps this study understand and interpret the actions of public affairs advisers involved in the management of key issues.

Heath posits that reputation 'cannot actually be controlled or managed but can be influenced by what organizations do and say, and what is said about them and done in regard to them' (p. 396). Heath goes on to discuss the example of scandal, putting this forward as a scenario which has ties to corporate and management failure.

This research draws a conclusion that diverges from Heath's view on an organisation's ability to affect reputation. Although it may be difficult to manage reputation, as a key component of IM, reputation management is achievable – not only in the lead-up to scandal or crisis. Drawing on Carroll (2008), the distinction between corporate identity and reputation is maintained, and it is instructive for the present discussion.

Heath places a high societal value on IM and RM, writing:

...as the rationale for such cognitions, behavioral intention, and behaviors, we find then the role for issues management coupled with risk management and communication as the rationale for collective thought, communication, and action in society. (2013, p. 397)

This approach may undervalue the role played by governments in representing and actioning collective thought and action in society, and takes an overly corporatist viewpoint – which may be more suitable to a US theorisation of IM and the public sphere.

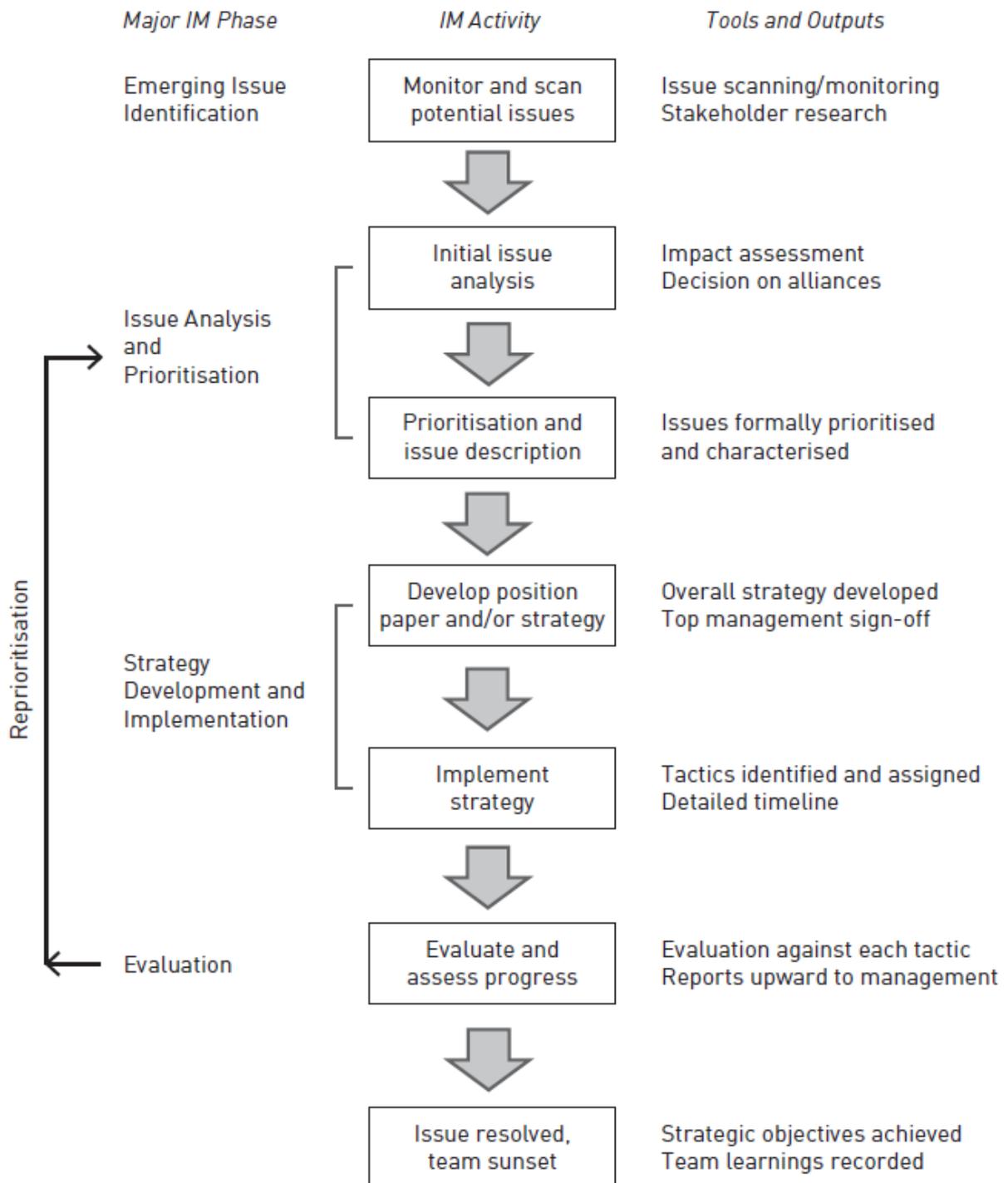
Palese and Crane describe IM in the context of RM, writing that IM is also about having 'the capacity to act quickly in order to seize opportunity or to avert risk before impacts or implications become relevant to your business's operations and/or reputation' (2002a, p. 1).

## APPENDIX 5 – Issue response models

"Chase/Jones Model" (1977) (in Kent, Taylor & Veil 2011)	Grunig & Hunt 1984, Theaker 2001, Lattimore et al. 2012	Palese & Crane 2002b (IMC)	Lerbinger 2006	Regester & Larkin 2008	Harrison 2008	Nicholls 2009	Heath 2013 (PAC)	Jaques 2014	Griffin 2014
Issue identification	Issue identification	Issue identification	Issue identification	Monitoring	Monitor, forecast, identify, track and understand the issues	Issue identification	Monitor public policy arena for trends	Issue identification	Horizon scanning
				Identification			Identify issue		
	Prioritise		Issue prioritisation	Prioritisation	Evaluate and prioritise each issue for action			Analysis & prioritisation	Prioritisation
Issue analysis	Issue analysis	Issue analysis	Issue analysis	Issue analysis	Assign responsibility	Issue analysis	Issue analysis and evaluation		Issue analysis
					Develop a position on each issue		Prioritise and establish company policy positions		
Identifying issue change strategy options	Identifying issue change strategy options	Strategy	Strategy formulation	Strategy decision	Develop a strategy for each issue	Decide on actions	Create company response from issue-change strategy options	Strategy options	Strategy
						Prioritise actions			
Developing an issue action program	Developing an issue action program		Implementation	Implementation	Implement the strategy	Rehearse actions	Implement plan through issue action programming	Action plans	Implementation
	Rehearse	Implement actions							
Evaluating the results	Evaluating the results	Measurement		Evaluation	Monitor and measure progress	Evaluate implementation		Evaluation	Evaluation

## APPENDIX 6 – IM process flow

(Jaques 2014, p. 37)



## APPENDIX 7 – IM practice taxonomy

The following table sets out a high level IM practice summary taxonomy. For a detailed list of all IM practices encountered in the data, see **Appendix 22 – All IM practices**.

Broad category	Practice example
Face-to-face	<ul style="list-style-type: none"> <li>• Lobbying and meetings with stakeholders to advocate for policy positions or attempt to exert influence.</li> <li>• Liaising with political representatives, including party officials, advisers or the relevant Minister, in a bid to influence policy.</li> </ul>
Strategic	<ul style="list-style-type: none"> <li>• Building alliances and helping to exert pressure at executive levels within organisations.</li> <li>• Preparing IM, PR or communication strategies.</li> </ul>
Research	<ul style="list-style-type: none"> <li>• Commissioning research in the hope that outcomes support a particular point of view (but they may not).</li> </ul>
Submissions	<ul style="list-style-type: none"> <li>• Preparing position papers, white papers, background research, policy papers or submissions to inquiries.</li> </ul>
Issue tracking	<ul style="list-style-type: none"> <li>• Identifying, analysing and tracking individual issues for organisations.</li> <li>• Advising senior executives within an organisation on the management of specific issues.</li> </ul>
Media engagement	<ul style="list-style-type: none"> <li>• Using media releases, backgrounders, door-stop interviews, or spokespersons to deliver messages.</li> </ul>
Public communication	<ul style="list-style-type: none"> <li>• Social media, editorials and advertising to directly influence target publics, for example, the campaign run in Australia by mining companies in response to the <i>Minerals Resource Rent Tax 2012 (Commonwealth)</i>.</li> </ul>

## APPENDIX 8 – Coding rules

The following sets out the rules applied to all coding undertaken for this study.

- Examining “practices” used to influence debate in an IM context (ie. not merely general communications practices that do not relate direct/indirectly to an NBN issue)
  - where potential overlap in IM practices, e.g. ‘submission’ and ‘providing information’: practice only coded against node corresponding to that practice on basis of the natural language of the interviewee, with more specific matches prioritised, reflecting the most likely practice being referred to – in all the context (ie. not coded against all the IM practice nodes that the practice could overlap with)
  - although useful and informative for the study (and conventional IM discussions), not coding internal IM practices where no link to a public policy dimension
  - some organisations: anything internal becomes matter of public affairs / policy, because of their involvement in the build (ie. reflects on the NBN build itself, so tied to a matter of public policy)
  - purely internal, not NBN related – not coded
  - only coded where relates to NBN public policy issues (ie. not other public policy issues)
  - where speaking generally about communications practices, but not in response to an IM question or in relation specific issue being discussed in IM context, then not coded: only coding communications practices that relate to an NBN issue or issues
  - where ambiguous as to whether performed for dominant purpose of IM, or there were mixed purposes (e.g. IM may not be the major purpose, but was an element of approach), still coded against IM practice as one of elements was IM element: is it an opportunity to convey messages for IM? If yes, then coded (e.g. Quinlivan)
- REFERENCES CLOSE TOGETHER
  - where refer to it, talk about something else, then continue talking about it, as in that specific example – *not coded again*
  - if unclear whether the same or different reference, any ambiguity – then *coded again*: could lead to duplicate codes – not an issue given will show added emphasis, practicality of coding large volume of qualitative data, cannot say every time refer to a type of practice “do you mean only for this or also for other issues” etc.
    - minimised by coding interviewees from same organisation at same time, single tranche
    - did most coding over short periods of time for intensive coding, one coder

- *if speaking generally – it is coded again*, e.g. first issue – what did you do? Meetings, second issue, what did you do? Meetings → coded twice, demonstrates emphasis, and cannot be clear whether the reference is to the same meetings (not practical to clarify every reference during interviews)
- Aimed to get codes from language used by interviewees – in vivo
- Issue category coding only for:
  - ◆ **IM practices**
  - ◆ **impact on debate**
  - ◆ **impact on policy**
- code to more specific nodes first
- Not recording references in the negative, ie. “we don’t use Facebook” – not coded under Facebook
- “Positive impact on debate” means aligned to actor's purposes/goals
- Where mention one thing, e.g. “research carried out”, then give an example, but not clear whether there were other types of research too, that’s coded again
- Active, critical coding approach used – not only looking for keywords: e.g. if asked about cost-benefit, and interviewee clearly talking about IM practice in relation to a different issue, then this coded under IM practice relating to that other issue
  - not just looking for individual words – e.g. “education”, where interviewee is describing *education*, but not using that word, still coded against “education”
- Generally: where relates to multiple issues – coded against predominant issue, or could fall under multiple practices – coded against predominant practice
  - unless some unique reason to code against multiple practices, but unusual
- Coded text at the beginning of the discussion (e.g. not full discussion of IM practice where lengthy or broken by brief digression then back into it)
- Questions generally coded too for context (Bazeley & Jackson 2013)
- Did not code cross-references (e.g. someone else – different organisation – did...) however it was noted
- Positive impact on debate includes keeping something *out of* the debate & neutralising the issue
- Broad, liberal capture of IM techniques: e.g. some internal issues where IM used also considered where link to public policy dimension
  - in terms of influencing the debate: given charged environment, anything to do with nbn would quickly and easily end up in the public debate
  - subjective organisational perspective on influencing an issue
- Not coding references to what other participants have done, commentary on others (except some on nbn against separate “Comment” node)
- If too general then not coded (except sometimes “in vivo” if significant) – otherwise e.g. “lobbying” – it’s all lobbying, “stakeholder engagement” – it’s all stakeholder engagement
  - e.g. “engaging with government” came up a lot – but then all IM actions are also “engaging with government” – so impractical to code

- Negative impacts on public debate not coded
- Interviewer's references not coded, e.g. 'you mentioned X before...'
- Coincidence not counted, e.g. someone else does a study supporting your position – not counted
- Not coding speculative, ie. "we could have done that", or what others did
- Where goes general to specific – general reference not coded, specific one is (e.g. refer to "materials" then say "information sheets" – most of the publications are "materials" – so code info sheets)
- Focus of coding was on *what people/organisations actually did*, over what they discuss
- Change in regulations or applicable laws is regarded as policy change: regulation guides the policy (e.g. LIFD – Kaiser)
- Coding focused on specific practices, rather than general characterisations or descriptions of how approached it
- Overly generic IM actions not coded, though acknowledged and used in the analysis
  - e.g. "we engaged with policymakers" not coded, because want to know specifically what interviewees did
- Broad coding to include context in each code (better for cross-referencing, analysis – Bazeley & Jackson 2013)

## APPENDIX 9 – Corporate communications

Corporate communications aims to achieve effective communications tailored to its audiences, within a strategic context. It brings much from marketing, hence the growth of marketing communications as a distinct field – overlapping with corporate communications. It involves the preparation of communication strategies as guiding documents, with components: situation analysis, goals and objectives, target publics, key messages, message strategies and tactics, evaluation, scheduling and budgeting. Most of what a practitioner does on a day to day basis relates to one of these component elements of broader corporate strategy.

Varey discusses the underlying politics inherent in the nature of communications:

Most corporate communication systems are systems of corporate control, when participation is required... We must shift from our general belief in liberal quasi-‘democracy’ and its adversarial expression of self-interest, opinion advocacy and persuasion, to a constitutive real participatory democracy of negotiated co-determination through interaction. (2001, p. 27)

Varey posits a ‘conversational model of corporate life that we can apply in pursuit of dialogue before expression... the conversational corporation is full of natural talk, curiosity, discussion and questions’ (2001, p. 28). Boyd notes that IM finds itself ‘at the confluence of public relations, advertising, rhetoric, and marketing’ (2009, p. 477). However, interview data demonstrated that the IM function is frequently spread across diffuse levels within an organisation.

In some instances it is the process or program managers who undertake IM, working alongside corporate communications and public affairs advisers. This was supported by the data and the widespread evidence of IM practices in policy, management, communications, government relations and PR functions.

Some commentators point to an intrinsic organisational perspective dominating IM writing (Boyd 2009), and this is clear from analysis of the literature to support the underlying theoretical framework of this study (e.g. Heugens 2005; Palese & Crane 2002b).

IM strategy is viewed from the perspective of an issue manager, who may be aiming to apply SIM to an issue, or prevent that issue from moving onto the public agenda. This prioritises the organisational perspective over a stakeholder viewpoint. It may be in the stakeholder’s interest for him or her to be aware of the issue, and be aware of its potential impact on his or her interests – and a CSR-focused approach may further support this view.

This study critically considers the perspective of authors cited in assessing commentary on IM, and the organisational-centric approach pervading the literature is relevant to the

positioning of IM and may contribute to suspicion about IM practices beyond the community of practitioners.

Organisational rhetoric is evident across writing on corporate and IM strategy, and this study acknowledges 'a general uneasiness about the role of organizational rhetoric in public dialogue: whose interests does it really serve?' (Boyd & Waymer 2011, p. 475).

In this respect, and adopting a CSR critique, IM could serve to further marginalise and disempower stakeholders whose interests may be adversely affected by IM or by a corporation's actions, with IM writing demonstrating a 'managerial bias as scholars overanalyze the ways and strategies an organization uses to address issues or concerns as opposed to considering the ways that these messages might adversely affect the various external stakeholders' (Boyd & Waymer 2011, p. 487).

However, the counterpoint is that management and corporate strategy literature must necessarily proceed from the perspective of the organisation involved in using these practices. It would be unhelpful, and not result in flowing argument, if this writing took both perspectives simultaneously.

IM literature should maintain an awareness of its own potential managerial and organisational bias, but cannot always approach strategy from two perspectives. Although there is some acknowledgement of the practicality of adopting an organisational perspective for literature on critical strategy:

So even the unit of analysis in our research, the organization, can possess hegemonic qualities because by virtue of what we study we demonstrate what is important to us to the exclusion of other perspectives. (Boyd & Waymer 2011, p. 487)

Nonetheless determining whose interests are marginalised and whose interests are represented becomes difficult as lines between public and private organisations continue to blur (Boyd & Waymer 2011). Notably, social media plays a role in enhancing the extent to which organisations are able to employ organisational rhetoric to manage issues in the public sphere.

## APPENDIX 10 – Agenda setting, priming and framing

This study uses the analytical lenses of agenda setting, priming and framework, which form key elements of the analytical framework. The use of agenda setting, whether in the form of agenda building by media organisations or journalists, or sparked by the initial influence of an issue manager, has been found, in the literature, to have a direct impact on public policy.

Nelson's 1991 study, based on a US example, demonstrated how a specific issue could achieve 'the public's agenda because the interest of a few pioneering researchers crossed the bridge to mass-circulation news outlets' (Protess & McCombs 1991, p. 170), which in turn prompted a direct policy response, 'prompting state legislatures into action' (p. 170). Similar results were found in studies by Protess et al. on the impacts of investigative reporting on agenda setting. Their method included:

...detailed tracing of the life course of a media report from an examination of the initial investigation by journalists, to the publication of the report, the effects on the general public and policymakers, and eventual policy outcomes. (1991, p. 171)

Where investigative reporting uncovered problems, 'officials directly responsible for the particular domain in which a problem is uncovered may feel obligated to take some action to show they are "responsive" and "responsible"', with investigative reporting putting 'policymakers on the defensive' (p. 186). Similar experiences were seen in interview data in a public policy environment, with Quinlivan describing his approach as relating to addressing and resolving a policy problem – viewing IM in terms of policy problem solving.

In applying the theoretical framework described here, an American bias emerged in the existing research on agenda setting, priming, framing and IM. So while Nelson (2011) and other uncovered specific examples of agenda setting leading to policy outcomes, this study has found that many factors affect whether that occurs in such a linear manner in an Australian context.

Examining the use of US and European IM practices in the Australian context necessarily requires a consideration of the differences in the types of modified public spheres across these regions, and how specific IM practices outlined in the US literature may be modified to Australian public policy applications.

McCombs views the media agenda as being one site, or coherent "list". He sees an 'intense competition among issues for a place on the agenda' as 'the most important aspect of this process. At any moment there are dozens of issues contending for public attention. But no society and its institutions can attend to more than a few issues a time' (2014, p. 81). However, this is not reflected by the findings of this study.

McCombs acknowledges a greater overall diversity of issues on the agenda, explaining this in terms of 'some issues now move on and off the public agenda faster than in previous decades' (p. 83), which is reflected in interviewee data describing how fast NBN issues were found to move across the public agenda in social media environments (e.g. Anon 19).

Where IM has an impact, through the use of IM practices, practitioners are able to place issues onto the media agenda, which in turn tells audiences *what* to think about. In his recent writing and research on agenda setting McCombs has emphasised the use of agenda setting in establishing the salience of certain messages, 'Newspapers communicate a host of cues about the relative salience of the topics on their daily agenda' (2014, p. 1). In this regard, agenda setting, along with priming and framing, also tells audiences *how* to think about issues (Macnamara 2012a).

McCombs proposes a model for how salience transfer occurs, centring on the concept of 'gatekeeping trust', which is the 'specific belief that news coverage is the result of systematic efforts by journalists to prioritize problems' (2014, p. 87). Readers assume that by reporting on certain news events, journalists are selecting the most important issues of the day for them, and so by relying on journalistic determination of importance readers are employing a 'cognitive shortcut' – not having to assess issue importance for themselves (p. 87).

The diffusion of the agenda and forums for debate within the modern public sphere means that individuals are more easily able to seek out accounts of non-mainstream issues, and make their own determination about issue salience. Active, interested audiences with high levels of awareness (such as those on ICT forums such as Whirlpool) are more likely to take that approach.

The media should not ordinarily be regarded as a "stakeholder" in communications or in IM (Mahoney 2013), although they can be regarded as a 'tertiary target public' in that they are able to influence and inform other target publics (p. 50). This is the approach taken in this study, with media organisations and journalists not regarded as primary stakeholders or influencers in the debate. One aspect of this is practicality – the interests of journalists add another layer to the debate in the public sphere.

In the Australian context two media organisations dominate, News Corporation owned by Rupert Murdoch, and Fairfax. Between them they own most major media outlets in Australia, with News Corporation being dominant (DoC 2014).

Interviewees noted potential impacts of the NBN on media organisations and on journalists. The NBN would arguably be a competitor and threat to mainstream media in Australia, as it would create competition in the market, by creating an additional media source and distribution medium. This could reduce revenue gained by media companies, because they could lose income through a challenge to pay TV revenues as individuals are

able to stream TV services, use on-demand source such as Netflix, or illegally download more video content faster.

Drawing on work by Li & Adams (1995) and Bowen (2005), Wang writes that 'at the heart of issue and crisis management in the public relations field is the question of interpretation, understanding priming and framing can help public relations practitioners prepare response planning' (2007, p. 124).

Referring to leading theorists on priming, Wang writes that '...by making some issues more salient than others, a *prime* influences the standards by which a particular issue is judged' (2007, p. 124). Sheaffer and Weimann, arguing for the broader application of priming theory, provide the following example of the practice:

If... the issue of foreign affairs was primed, then people would judge the president's performance by mostly evaluating his performance in the area of foreign affairs; whereas if economy were primed, it would become the basis for evaluating the president's performance. (2005, p. 350)

This example shows how the term 'priming' is being employed in this study. Priming has been evident in media coverage of the NBN, with the media emphasising certain NBN issues repeatedly, some of these characterised as negative (e.g. lack of a CBA, asbestos), and others characterised as positive (e.g. reducing the digital divide, encouraging competition).

Analysing the main NBN issues on the public agenda confirmed that various actors in the debate had prerogatives in certain issues being represented on the agenda in preference over others, with these being characterised as positive or negative for the NBN project overall.

Iyengar and Kinder view priming theory in a political context, in that it:

...presumes that when evaluating complex political objects... citizens do not take into account all that they know... What they do consider is what comes to mind, those bits and pieces of political memory that are accessible. And television news, we argue, is a most powerful force determining what springs to the citizen's mind and what does not. (1987, p. 4)

Iyengar and Kinder's view is supported by the results of their study demonstrating that news coverage of a subject primed audiences to giving that subject more weight in making political judgements. Audiences are primed to recall these subjects when making subsequent judgements.

Nelson, Clawson and Oxley describe framing as 'the process by which a source defines the essential problem underlying a particular social or political issue and outlines a set of considerations purportedly relevant to that issue' (1997, p. 222).

There are many ways IM practitioners can influence how issues are framed, one of which is the use of language and the way the issue is described. For example, in the immigration debate in Australia, immigrants are variously described as “boat people”, “illegal immigrants” or “refugees”, and analysts have considered how the use of this language can influence the way immigrants are perceived in the discussion (Brookes 2010, Macnamara 2012a).

Wang notes that ‘framing involves the organization and packaging of information and the process by which a communication source defines and constructs an issue’ (2007, p. 124), adding that ‘*a frame* is a story line or organizing idea that provides meaning’ (2007, p. 126). He confirms the relationship between priming and framing in his CSR study:

When people read primed messages that offered an important issue but did not carry a specific evaluative implication, they consider the primes. When people read a news report that offered a direct link between an issue and a target corporation and carried a specific evaluative implication, they tended to adopt this frame of reference in their own thinking based on their previous positions held toward the issue. (2007, p. 143)

Wang’s CSR study is relevant to the immediate inquiry, because agencies, whether public or private, are likely to use techniques of priming and framing to influence their corporate reputations, which are also affected by their CSR endeavours.

Wang continues, outlining the link between the two, with primes providing the necessary background for frames to operate effectively, associating specific issues with specific frames:

...a frame that is supposed to set up an issue may not influence people’s judgments if there is no prime that builds up the heightened accessibility and awareness of the issue... The results have confirmed that frames that provide this sort of link shape how people form judgments if people hold no persistent attitudes. However, the absence of the priming effect prevents the framing effect from influencing people’s judgments. (2007, p. 128–143)

Studies have demonstrated use of framing by issue managers, and shown these frames reflected in media coverage (e.g. Darmon, Fitzpatrick & Bronstein 2008). McCombs discusses studies looking at links between how issues are reported, especially the tone of reporting, and opinions and perceptions of those issues. McCombs uses the concept of ‘attribute salience’ (2014, p. 101), which overlaps with framing.

Tone is also reflected in polarity of media reporting on an issue. Use of ‘framing’ in this study encompasses tone and polarity, because to report something negatively – depending on how and why that is done – is also to frame it by making the negative elements more salient in the text (consistent with Entman 1993), and reflects judgments made by the message creators (consistent with Hallahan 1999).

Finally, McCombs, using his attribute salience model, reflects on studies of negative, or cynical reporting of public and political issues. He recounts established links between this negative style of reporting (of which there was an abundance regarding the NBN) and reader cynicism about the topic. For example, he notes that 'effects of tone are not limited to attitudes and opinions about politics. Negative newspaper headlines about the economy influence the public's perceptions regarding the health of the economy' (2014, p. 103).

## APPENDIX 11 – Establishing trustworthiness

Theorists note that trustworthiness involves establishing credibility, transferability, dependability and confirmability (Lietz & Zayas 2010; Shenton 2004). As reflected in Shenton (2004), 'in addressing credibility, investigators attempt to demonstrate that a true picture of the phenomenon under scrutiny is being presented' (p. 63).

This study drew on Stake (2008), Yin (2014) and Miles, Huberman and Saldana (2014), to guide the case study approach adopted, using in-depth interviews (Seidman 2013) as the primary method. Stake, Yin, Miles, Huberman and Saldana are known and established in their fields. Through the interviews, some understanding of the culture of participating organisations was developed – although this was less important given the focus of this study.

There is a risk in research design that the phenomenon being studied may be lost (Silverman 2013). Here IM and its interaction with policy is the phenomenon being examined, and this phenomenon – to use constructionist language – is thought to exist outside of the research or the researcher's own view and in the public sphere in Australia.

Complementing the interviews with semi-structured qualitative textual analysis both of media coverage and of secondary NBN materials meant that triangulation could be employed to examine and establish a deeper understanding of the development of issues (Guba 1981, Brewer & Hunter 1989, Shenton 2004). This triangulation was also possible on the primary interview data, allowing analysis of individual issues, their management, and specific IM practices, from the perspectives of all the primary organisations affected.

The use of 'different methods in concert compensates for their individual limitations and exploits their respective benefits' (Shenton 2004, p. 65). The use of secondary materials helped triangulate the progress of specific issues being followed, 'supporting data may be obtained from documents to provide a background and to help explain the attitudes and behaviour of those in the group under scrutiny, as well as to verify particular details that participants have supplied' (Shenton 2004, p.65).

During interviews, subjects were asked whether there were any additional documents they were able to share with the researcher, and these were used to 'shed more light on the behaviour of the people in question' (p. 66).

This study acknowledges there can be shortcomings in the use of in-depth interviews in the context of the RQs being examined (Shenton 2004), but through the careful and consistent application of the chosen methodology and methods, these were successfully overcome. The study also employed triangulation, using multiple interviewees to examine the same use of IM practices regarding the same issue – also providing the opportunity for corroboration (Shenton 2004; van Maanen 1983).

Going beyond corroboration, Dervin posits the notion of 'circling reality', which was employed here. This is the 'necessity of obtaining a variety of perspectives in order to get a better, more stable view of 'reality' based on a wide spectrum of observations from a wide base of points in time-space' (2015, viewed online). This was useful where there was less information available from one entity or from one issue manager, but another organisation, interview or secondary source was able to fill in the gaps.

With the qualitative, interpretivist approach taken, the role of the researcher's perspective and consequent interpretation needs to be acknowledged and contextualised, as noted by Creswell:

Researchers recognize that their own background shapes their interpretation, and they "position themselves" in the research to acknowledge how their interpretation flows from their own personal, cultural and historical experiences. Thus the researchers make an interpretation of what they find, an interpretation shaped by their own experiences and background. The researcher's intent, then, is to make sense of (or interpret) the meanings others have about the world. (2013, p. 25)

Potential biases are acknowledged in terms of the researcher's own background in policy and IM. Various techniques and checks were employed throughout the study to minimise any impact from potential bias or preconception, with the researcher being 'explicit and as self-aware as possible about personal assumptions, values and biases, and affective states' (Miles, Huberman & Saldana 2014, p. 312) throughout data collection, analysis, and thesis drafting.

Concerns about bias were addressed in part through 'reflective commentary' (Shenton 2004, p. 10), both during the study, and as described in this thesis. The researcher's background was also a strength, giving him an understanding of the language and broader context of the case study, and assisting in making sense of the data. The researcher was not a member of any political organisation for the duration of the study.

However, given the selected approach and methodology, the study was not specifically aiming for some unattainable objectivity, as noted by Lichtman, 'Postmodernists, interpretivists, constructivists, and feminists acknowledge that the elusive objectivity often sought in traditional or scientific research is inappropriate in the qualitative research arena' (2013, p. 21).

A common criticism of a case study approach with a small number of case studies – in this case only one – is a lack of generalisability (Kennedy 1975). However, Yin more recently writes:

Case studies, like experiments, are generalizable to theoretical propositions and not to populations or universes. In this sense, the case study, like the experiment, does not represent a "sample," and in doing case study research, your goal will be

to expand and generalize theories (analytic generalizations) and not to extrapolate probabilities (statistical generalizations). (2014, p. 21)

The immediate case of the NBN is not designed to provide generalisable findings. On the contrary, it is designed to examine very specific aspects of the Australian policymaking process involving matters of ICT public policy.

A number of critiques of the chosen methodology for this study could be proposed. For example, the constructionist qualitative theorist could argue that to take an approach which is based on interviews is inherently flawed, because a researcher does not know when s/he obtains interview data whether the data can be relied upon.

For a constructionist, any data obtained from an interview is merely indicative of what somebody says about the representation of what happened. For such a critic, this may or may not bear any relationship to what actually occurred, and so this may or may not tell us anything about what actually happened.

One of the difficulties with asking questions in interviews is that this can present the interviewer's categories to the interviewee. So by bringing any categories a researcher could, in effect, taint data that is obtained through questioning. Further, a constructionist critique (e.g. Silverman 2013) could argue that the responses to interview questions would be given in terms of the categories that were brought to the interview.

Although the approach adopted in the study – using qualitative in-depth interviews – is arguably the majority approach, a lot is learnt from other more naturalistic, constructivist approaches. There are ways to help guard against the dangers highlighted by constructionists. This can partly be achieved by using open-ended questions that do not suggest specific categories, which was the way the interview questions in the current study were designed.

In the defence of the qualitative approach taken in this study, it is important to demonstrate why this approach has been adopted, and not an alternative approach. RQ1 could arguably have been addressed through the use of a quantitative methodology. However, the complexity of IM, and the disparate factors that have a role in the course of an issue in the public sphere could not be fully captured or examined through the use of a wholly quantitative approach.

The interviews were semi-structured, in that baseline questions were used. However, these were tailored to the interview context, and the interviews were undertaken in an open manner without cutting off interviewees – giving them plenty of time to reflect on IM practices they had used in the public debate. No unnecessary frames were introduced to interviews.

Information was provided to interviewees before interviews, as required by UTS GRS protocol, reflecting the study's focus on IM. Detail was not provided to interviewees

beyond what was necessary to keep them broadly in within the relevant field the study for the course of the interviews. In this regard, the purity of the data being obtained was balanced against a need to pragmatically undertake the interviews and to obtain useful data that could provide insights into IM practices undertaken, and their effects on debate.

## APPENDIX 12 – Issue salience data

See following the results of Factiva searches to establish primary issue salience. This informed the initial selection of issues, timeframes, and confirmed the direction of the study over its course (given the period of the study overlapped with the ongoing development of these issues).

In relation to Factiva searches and timeframes:

- Identical results not counted.
- Time periods using quarters.
- If other permutations of phrasing were used, search results would have been higher across all six issues, but this was not deemed necessary as this component of the initial research was simply to confirm basic issue salience.
  - For example, for “cost-benefit analysis”, other phrasing was not searched, such as “analysis of the costs and benefits of”.
  - Only minimal expressions and limited words were searched for indicative issue salience over the periods in question.
- Recent search data is used.
  - Although searches were performed early in the study and at multiple times during its course to refine issue selection, ie. going from “regulatory settings” as the primary issue, to the sub-issue of “structural separation”.
  - This was necessary because some of the time periods go through almost to the time of submission, so updated data was necessary for inclusion in the thesis.

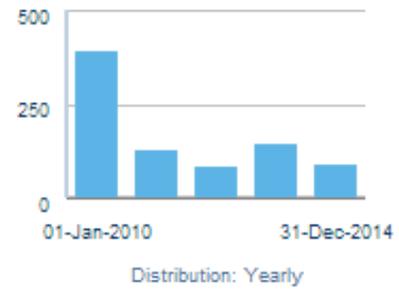
Print media sources:

1. *The Australian* (national, News Corporation / Murdoch)
2. *Herald Sun* (Victoria, News Corporation / Murdoch)
3. *The Australian Financial Review* (national, Fairfax)
4. *The Sydney Morning Herald* (NSW, Fairfax)
5. *The West Australian* (Western Australia, Seven West Media)

	Start date	End date	Articles
1. Cost (CBA)	1/1/2010	30/09/2014	815
2. Building the NBN (asbestos)	1/1/2013	31/12/2013	236
3. Security (Huawei)	1/1/2012	31/12/2013	339
4. Digital divide	1/7/2009	30/6/2014	89
5. Regulatory settings (structural separation)	1/4/2008	31/3/2014	955
6. Content (copyright)	1/1/2011	30/9/2013	142

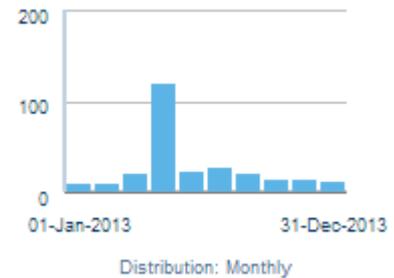
## Cost (CBA)

Text	("cost-benefit analysis" or "cost benefit analysis") and ("NBN" or "national broadband network")
Date	01/01/2010 to 30/09/2014
Source	The Australian Or Herald-Sun Or The Australian Financial Review Or The Sydney Morning Herald Or The West Australian
Author	All Authors
Company	All Companies
Subject	All Subjects
Industry	All Industries
Region	All Regions
Language	English
Results Found	815
Timestamp	26 August 2014 9:19 AM



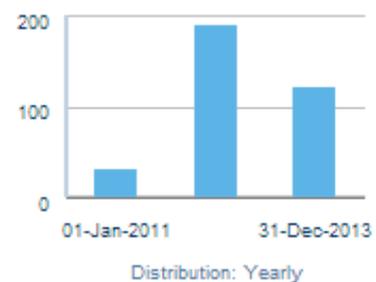
## Building the NBN (asbestos)

Text	"asbestos" and ("NBN" or "national broadband network")
Date	01/01/2013 to 31/12/2013
Source	The Australian Or Herald-Sun Or The Australian Financial Review Or The Sydney Morning Herald Or The West Australian
Author	All Authors
Company	All Companies
Subject	All Subjects
Industry	All Industries
Region	All Regions
Language	English
Results Found	236
Timestamp	26 August 2014 9:27 AM



## Security (Huawei)

Text	"huawei" and ("NBN" or "national broadband network")
Date	01/01/2011 to 31/12/2013
Source	The Australian Or Herald-Sun Or The Australian Financial Review Or The Sydney Morning Herald Or The West Australian
Author	All Authors
Company	All Companies
Subject	All Subjects
Industry	All Industries
Region	All Regions
Language	English
Results Found	339
Timestamp	26 August 2014 9:33 AM



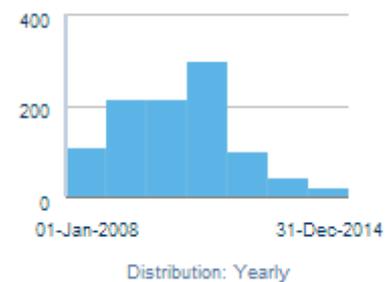
## Digital divide

Text	"digital divide" and ("NBN" or "national broadband network")
Date	01/07/2009 to 30/06/2014
Source	The Australian Or Herald-Sun Or The Australian Financial Review Or The Sydney Morning Herald Or The West Australian
Author	All Authors
Company	All Companies
Subject	All Subjects
Industry	All Industries
Region	All Regions
Language	English
Results Found	89
Timestamp	26 August 2014 9:36 AM



## Regulatory settings (structural separation)

Text	("structural separation" and "telstra") and ("NBN" or "national broadband network")
Date	01/04/2008 to 30/03/2014
Source	The Australian Or Herald-Sun Or The Australian Financial Review Or The Sydney Morning Herald Or The West Australian
Author	All Authors
Company	All Companies
Subject	All Subjects
Industry	All Industries
Region	All Regions
Language	English
Results Found	955
Timestamp	26 August 2014 9:47 AM



## Content (copyright)

Text	("copyright" or "piracy") and ("NBN" or "national broadband network")
Date	01/01/2009 to 31/12/2013
Source	The Australian Or Herald-Sun Or The Australian Financial Review Or The Sydney Morning Herald Or The West Australian
Author	All Authors
Company	All Companies
Subject	All Subjects
Industry	All Industries
Region	All Regions
Language	English
Results Found	142
Timestamp	26 August 2014 9:55 AM



## APPENDIX 13 – Baseline interview questions

The following baseline interview questions were used during semi-structured interviewing for all interview data collected.

	Cost (CBA)	Building the NBN (asbestos)	Security (Huawei)	Digital divide	Regulatory settings (structural separation)	Content (copyright)
1. When did you first become aware of this issue?						
a) How did you become aware of it?						
b) What <i>stage</i> was it at when you first became aware of it: potential, emerging, current, crisis, dormant?						
2. What was your organisation's perspective on this issue?						
a) Was this issue <i>positive, neutral or negative</i> for your organisation?						
b) What was the potential impact of the issue on your organisation?						
3. Did you seek to 'manage' or 'influence' this issue?						
a) What did you do, and what strategies did you employ, to manage the issue?						
i) When the issue was internal and not in the media?						
ii) When the issue was reported in the media?						
b) What was the impact of these actions?						
i) Were you able to measure the effect of the issue intervention?						
ii) How did you measure it?						
iii) What was the outcome?						
c) How did the issue develop/progress?						
d) Did you change your issue response strategy as the issue developed?						
i) If so, what motivated the change?						
4. Overall, was the response to the issue successful?						
a) Why was it successful/unsuccessful?						
5. Did your response affect the public debate regarding the issue?						
a) How did this effect occur?						
6. Were there any specific government or organisational policies developed in relation to this issue?						
7. Did media attention and/or the way the issue developed affect the way related public policy was:						
a) Developed with regard to this issue?						
b) Implemented?						
c) Subsequently changed?						
d) Discussed/portrayed in the media?						
8. Were there any other effects on government or organisational policy (at the bureaucratic or political level) as a result of: the issue, media attention, or the way the issue was managed?						
a) Was there any evidence to show these effects?						
9. Did you change your approach to stakeholder engagement due to:						
a) Media attention on the issue?						
b) The way the issue was managed?						
c) If so, how did the media attention / way the issue was managed affect your approach to stakeholder engagement?						

## APPENDIX 14 – Interviewee list

This list is only an *indicative of interviewees* who participated in this study (due to anonymity requirements). Where interviews with the same interviewee occurred over multiple dates, only the first date is used when referring to that interview. All interviews were conducted in 2014 and 2015.

Name	Most relevant position(s) to the study	Current/former (as at 31/3/2015)	Organisation	Organisation type	Primary office location	Interview date
Anon 8			Telstra	Industry	Melbourne	2014
Stephen Dalby	Director	Former	iiNet	Industry	Sydney	5 February 2014
Tim Marshall	External Affairs Director	Current	Alcatel-Lucent	Industry	Sydney	5 June 2014
Anon 3			Huawei	Industry	Sydney	2014
Daryl Quinlivan	Deputy Secretary	Former	DoC	Government	Canberra	18 June 2014
Kristen Hannah	General Manager, Strategic Communications Branch	Current	ACCC	Regulator	Sydney	7 October 2014
Michael Cosgrove	Executive General Manager, Infrastructure Regulation Division	Current	ACCC	Regulator	Sydney	7 October 2014
Mike Kaiser	Senior Executive	Former	nbn	Government/Industry	Melbourne	1 April 2014
Scott Rhodie	Digital Communications Manager	Former	nbn	Government/Industry	Melbourne	5 September 2014
Anon 2			nbn	Government/Industry	Melbourne	2014
Anon 14			nbn	Government/Industry	Melbourne	2014
Anon 15			nbn	Government/Industry	Melbourne	2014
Paul Fletcher	Parliamentary Secretary to the Minister for Communications	Current	Liberal Party	Political	Sydney	22 August 2014
Anon 19			Liberal Party	Political		2014
Senator Stephen Conroy	Communications Minister	Former	ALP	Political	Melbourne	18 February 2015
David Havyatt	Special Adviser	Former	ALP	Political	Canberra	14 April 2014
John Stanton	Chief Executive Officer	Current	Communications Alliance	Industry body	Sydney	7 May 2014
David Forman	Executive Director	Former	CCC	Industry body	Sydney	20 May 2014
Adam Ladders	Communications Manager	Former	IBES	Research	Melbourne	19 May 2014
Anon 1			IBES	Research	Melbourne	2014
Anon 10			ACCAN	Advocacy/NGO	Sydney	2014
Vanessa Hutley	General Manager	Current	MRA	Advocacy/NGO	Sydney	6 June 2014

## APPENDIX 15 – IBES results

This table, a thematic count of articles in media analysis (above one article), is extracted from an IBES 2014 report examining issues salience in the NBN debate (p. 51). It used mixed methods analysis on 1,060 articles from 1/7/2008 – 1/7/2013 in news articles from *The Australian* (News Corporation, Murdoch) and *The Age* (Fairfax). Rows highlighted in orange relate to one of the primary issues tracked for this study (showing that all are represented), and themes highlighted in grey relate to at least one of the sub-issues.

Major theme	No. of articles	Percentage of total
Telstra (including structural separation)	173	16.24%
NBN executives/staff (including Alcatel corruption controversy & hiring of consultants)	72	6.76%
Sub/contractors (including tenders, delays, price gouging, union action)	70	6.57%
NBN costs	70	6.57%
NBN business case (including economic benefit, general viability, cost benefit analysis calls)	69	6.48%
Rollout issues	59	5.54%
Labor NBN policy & bill & election	39	3.66%
NBN prices (wholesale and retail)	38	3.57%
Business views on and uses of NBN	30	2.82%
Labor/Coalition debate on & Coalition critique of NBN	29	2.72%
Coalition HSB policy	28	2.63%
Optus	27	2.54%
Telecommunications industry	27	2.54%
NBN monopoly and/vs competition (including anti-cherry picking)	25	2.35%
ACCC	21	1.97%
Asbestos & asbestos-related liability	20	1.88%
NBN rollout areas & issues (including pork barrelling)	20	1.88%
Take up of NBN	18	1.69%
ICT and general labour shortage (including 457 visas & construction issues & ICT training)	17	1.60%
Rural & regional Australia	17	1.60%
NBN promotion & “spruiking”	16	1.50%
Wireless	16	1.50%
Premises connection issues and laws (including opt-in & opt-out)	14	1.31%
NBN technologies	13	1.22%
Tasmania	12	1.13%
NBN applications (including health, arts, education)	12	1.13%
Huawei	11	1.03%
Business investment in NBN	10	0.94%
NBN and societal benefits	10	0.94%
ISPs	9	0.85%
TV	8	0.75%
Productivity Commission	8	0.75%
NBN testing technologies and test bed sites (including CSIRO Ngara)	8	0.75%
Fixed-line telephony	8	0.75%
Remote Australia (including Indigenous communities)	6	0.56%
Data security & risks	6	0.56%
Service Stream	4	0.38%
The Greens & the NBN	4	0.38%
iiNet	3	0.28%
Newspapers/press	3	0.28%
Digital divide	3	0.28%
Emergency services & government security agency access	3	0.28%
<b>Total</b>	<b>1060</b>	<b>100%</b>

## APPENDIX 16 – All issues list

This sets out all the significant NBN issues encountered during the study.

### 1. Cost

- High cost of building the NBN
- Calculating NBN cost

### 2. Building the NBN

- Oversight
- Asbestos
- Delays with building the NBN, speed of the build
- Managing expectations about delivery
  - Where to roll out first
  - Not getting the NBN after seeing will get it on website
  - Not getting FTTP and getting fixed wireless instead, getting FTTN, or not getting NBN at all
- Technology
  - Technology change
  - Predicting future technology trends
  - Choosing which technology – fibre, fixed wireless
  - Standards
  - FTTN vs FTTP
  - Technology mix
  - Transfer speeds & latency
- Opt-in or opt-out/defer models
  - Consent for tenants
- Ageing infrastructure (maintaining copper)
- Job security at nbn
- Migration
  - Service continuity
  - Clarity around roles, responsibilities, accountabilities
  - Serviceability
  - Product availability
  - Information sharing and communications co-ordination
  - Missed appointments
  - Vulnerable customers (e.g. medical alarms)
  - Complex dwellings
  - Accurate customer details, names etc.
- Disconnection date (DCD) – lack of understanding that deferral means no service when switch off copper
- Managing organisational reputation/brand & avoiding political debate
- Over-engineering of the NBN
- Fast growth of nbn
- Creating a company from scratch (nbn)
- Quality issues with specific NBN technology products
- Competence of the construction industry & their ability to deliver the NBN
  - Skills shortfall

- Project complexity
- Misinformation

### 3. National security

- Huawei
  - Managing the issue within Huawei between Australian & Chinese offices and approaches
- Barring certain types of equipment from being used in Australia
- Critical infrastructure protection
- Australian cultural perception of distrust of China

### 4. Digital divide

- Creating a digital society
- Consumer education re NBN

### 5. Regulatory settings

- SSU
- SAU
- USO
- CSG
- Aerial deployment
- Pricing, cost of accessing the NBN
- Battery backup
  - Opt-in/opt-out
  - Cost
  - Size & appearance
  - Making battery obligatory
  - Environmental issues
  - Emergency phone line
  - Who is responsible for them – nbn or RSP
  - Messaging around battery backup
- Cherry-picking, FTTB, greenfields
- State boundaries & federalism preventing delivery of services via NBN
- Convergence
- NBN OTT services
  - Transitioning
  - Medical alarms
- Competition
  - Maintaining an NBN wholesale monopoly
  - Market effects
  - Structural separation of Telstra
  - Protecting nbn from competition

### 6. Content

- Lack of uses for faster broadband speeds
- Copyright infringement
  - Practical steps rights-holders can take
    - Secondary liability

- Third party injunctions
- Advertising revenue to pirates
- Faster and growing unlicensed content sharing
- Illegal content
- IPTV
- Telework
- Content filtering
- Net neutrality & shaping
- Digitisation of Australian content

## **APPENDIX 17 – Issue selection background**

### **Cost (CBA)**

For the issue of cost and the CBA, voter stakeholders would have expected the Communications Minister to select the most cost effective solution for Australia's broadband needs. There was a debate in the public sphere about the economics of the NBN proposal, and whether it is the best solution, with a range of infrastructure providers including Telstra and Optus having financial interests in the outcome of the debate, which was reflected in interview data.

### **Building the NBN (asbestos)**

Asbestos became the focus of build issues, because it presented the opportunity for discrete analysis of an issue that reached a crisis point over a relatively short period (12 months) – although interviewees indicated it was well known for some time before it broke on the public agenda.

Other sub-issues included the delay with rolling out the NBN, and the FTTN vs FTTP debate. The potential for an internal organisational IM component for the asbestos issue was another factor that led to it being chosen.

The debate in the public sphere about which technology should be used to build the NBN involved stakeholders with commercial or policy interests in the deployment of specific technologies. For example, an organisation that builds wireless infrastructure has a commercial interest in a public policy outcome that favours choosing a wireless technology solution to provide broadband access.

Consequently, such an organisation may favour a FTTN proposal rather than a FTTP proposal. This debate touches on questions of how to predict future technology requirements – a vexed issue for nbn. There are corollaries with other major infrastructure projects in Australia, for example building the rail network, and how to predict future demand.

At nbn IM practices were employed through the nbn website, [www.nbnco.com.au](http://www.nbnco.com.au), in a bid to influence the public debate about the choice of technology for parts of the rollout. In this case, public support for implementation of NBN policy was likely to be in nbn's organisational interests. Relevant target publics and stakeholders, including the Communications Minister, expect nbn to choose technologies that are likely to meet Australia's current and future telecommunications needs. Various parties, including Telstra, Optus and nbn, have commercial interests attached to the technology choices.

### **Security (Huawei)**

Of the security elements in the NBN debate, the Huawei issue was the most prominent, and it included a clear expectation gap. Voters and other stakeholders would likely expect

any government to ensure national security and the protection of critical infrastructure, of which the NBN is a key part.

The government position reflected concerns reported overseas by governments that shared intelligence with Australia. A US Parliamentary Report (Rogers 2012) had found:

The Committee received information from industry experts and current and former Huawei employees suggesting that Huawei, in particular, may be violating United States laws. These allegations describe a company that has not followed United States legal obligations or international standards of business behavior... The investigation concludes that the risks associated with Huawei's and ZTE's provision of equipment to U.S. critical infrastructure could undermine core U.S. national-security interests.

**Recommendation 1:** The United States should view with suspicion the continued penetration of the U.S. telecommunications market by Chinese telecommunications companies. (p. vi)

### **Digital divide**

The issue of digital divide received 89 hits across a period of 1 June 2009 to 30 June 2014 on the basis of the issue salience data (**Appendix 12 – Issue salience data**). One reason for the low count is the way the digital divide is described and how it manifests in the debate – ‘digital divide’ itself is arguably an academic and policy term, which was not always present in media discussions, which would instead allude to a gap in speeds between the country and the city, or between the poor and the wealthy. These results were not captured in the Factiva searches, and there would be too many permutations of these phrases, making further searching for those terms unlikely to yield useful results.

Although it did not appear extensively in the media, the question of how to address the digital divide was also central to many of the other NBN policy settings, for example, in the area of regulatory settings. An underpinning element of the NBN debate from well before 2009 was addressing a perceived inequality between those who had faster internet speeds and those suffering slower speeds, and interview data confirmed that this was as driving element of the initial decision to propose a FTTN network. Consequently a decision was taken to retain digital divide as one of the issues tracked.

### **Regulatory settings (structural separation)**

The larger telecommunications companies, for example Telstra, have an active interest in the regulatory settings surrounding the NBN. It can be posited that these settings directly affect Telstra's commercial future, and the fortunes of other providers (which was confirmed by interview data). Telstra remains the dominant incumbent in the Australian communications market, with 45.2 per cent of market share. This is followed by Singtel Optus, number two in the market, with 19.3 per cent (Bingemann 2014).

For the government, there is arguably an expectation on behalf of voter stakeholders that government will achieve optimal regulatory settings: regulatory settings that return a high performance dividend with minimal cost. Where there is a perception or reality that government or agencies are not succeeding in this task, this issue may be reported widely in the press and become a focus of debate in the public sphere. As part of the cost debate, other factors such as job creation and nation building are also considerations.

Industry stakeholders, including company shareholders, are arguably entitled to expect government to create an environment in which they can trade fairly and equitably. Government, and agencies such as the ACCC, ACMA and the DoC, were involved in establishing the regulatory settings for the NBN, and in influencing and informing the public debate about those settings. Telecommunications providers have a direct interest in influencing the public debate about NBN regulatory settings, and were found to use IM practices to attempt to influence this debate to achieve favourable outcomes.

### **Content (copyright)**

The addition of copyright as a content issue emerged during initial interviews, with Dalby (formerly of iiNet) suggesting this could be a suitable IM case study. It is apparent from broader media analysis that it would be in iiNet's interests to promote the copyright issue, as it was an important moment for Australian ISPs in their battle against rights holders.

Wider research, including results shown in **Appendix 12 – Issue salience data** confirmed the association between copyright and the NBN in some areas of the public debate. Copyright and file-sharing is a broader issue in the Australian public policy debate, but in part at least there is an overlap with the NBN.

Interviewees had mixed reactions to the introduction of questioning about the NBN and copyright, some indicating they thought it was an NBN issue, others saying they believed it was not an NBN issue (e.g. Fletcher).

Over the reference time period, 1 January 2011 to 30 September 2013, 142 media results were found where the NBN and copyright was referenced together in the same article. This does not mean in every one of those cases they were directly linked, but a selective analysis of articles in Factiva results indicated that in most cases they were associated in some way in this media reporting.

Research supported the view that there is a concern broadband speeds will enable greater levels of piracy through the use of file sharing networks, and it would also enable streaming copyrighted television content into Australia, which could threaten exclusive distribution deals that Australian broadcasters have obtained (Dalby, iiNet).

McKenzie and Wells found that:

With the National Broadband Network (NBN) progressively rolled-out over the next decade, content industries fear that digital piracy will proliferate even further as consumers are able to access and download illegal content with increasing speed and ease. (2013, p. 4)

McKenzie and Wells also found that broadband speeds are likely to increase piracy, vindicating, on the basis of their study, fears expressed by the content industries:

Although the present impact on box office revenues appears small, with the increasing use of file-sharing technology and increased speed of bandwidth in Australia, this problem is likely to increase... over the time-frame of our study, Australian broadband internet plans and speeds were often restrictive for downloading films but this will change dramatically in coming years especially with the roll-out of the... NBN. (2013, pp. 3–13)

These findings, together with interview data, support the inclusion of copyright as a public policy issue that has some relationship with broadband speeds, and ipso facto, the NBN. The primary basis of its inclusion is that it affords a valuable insight into IM and the public sphere and policy, rather than the strength of its connection to the broader NBN rollout.

In relation to applications, the other major contender was the issue of whether there would be sufficient uses for the high bandwidth available via the NBN. At the political level of the public debate there was argument about the merits of making high-speed bandwidth available when there would arguably be few uses for it. Copyright was selected as the main focus for this category because of its greater prominence in the public sphere and interview data suggesting it may be a better site to examine the use of IM.

## APPENDIX 18 – Issue polarity and perspectives

The following sets out whether the primary issues were positive, negative or neutral from organisational perspectives. It includes a table showing issue perspectives in more detail – applying definitions used in this study.

The data in this appendix is an approximation, averaged over the period for which the issue was tracked as per **Appendix 12 – Issue salience data**, as polarity shifted for some participants in the debate – for example an issue could initially be negative for an organisation, but then depending on how it developed, present an opportunity – and become a positive issue. These approximations are developed from interview data (where applicable), textual analysis of secondary materials, and targeted media analysis.

### Major organisations in the debate

Telstra	nbn	Liberal Party	ACCC	MRA	ACCAN	IBES
Optus	DoC	ALP			CCC	
iiNet					Comms	
Alcatel-					Alliance	
Lucent						
Huawei						
TPG						

## Issue polarity

### Cost (CBA)

Negative	Neutral	Positive
ALP DoC ACCAN CCC Optus iiNet Alcatel-Lucent Huawei IBES	TPG	Liberal Party Telstra
	<b>Mixed</b> Communications Alliance MRA	
	<b>Not applicable</b> ACCC	

### Building the NBN (asbestos)

Negative	Neutral	Positive
Telstra ALP nbn DoC ACCAN Communications Alliance IBES	MRA iiNet TPG	Liberal Party
	<b>Mixed</b> ACCC CCC Huawei Optus Alcatel-Lucent	
	<b>Not applicable</b>	

### Security (Huawei)

Negative	Neutral	Positive
Optus Huawei	TPG Telstra iiNet ACCAN	Liberal Party
	<b>Mixed</b> Alcatel-Lucent nbn DoC ALP CCC IBES Comms Alliance	
	<b>Not applicable</b> ACCC MRA	

## Digital divide

Negative	Neutral	Positive
ACCAN MRA	ACCC	TPG Telstra iiNet Alcatel-Lucent Huawei Optus nbn ALP CCC Comms Alliance IBES
	<b>Mixed</b>	
	DoC Liberal Party	
	<b>Not applicable</b>	

## Regulatory settings (structural separation)

Negative	Neutral	Positive
Telstra	ACCC MRA	Optus CCC TPG iiNet Alcatel-Lucent nbn DoC ALP ACCAN IBES
	<b>Mixed</b>	
	Comms Alliance Huawei Liberal Party	
	<b>Not applicable</b>	

## Content (copyright)

Negative	Neutral	Positive
Optus Telstra DoC Liberal Party MRA CCC Comms Alliance	TPG Alcatel-Lucent Huawei ACCC	
	<b>Mixed</b>	
	iiNet nbn ALP ACCAN IBES	
	<b>Not applicable</b>	

## Issue perspectives

This sets out how and why each of the major NBN issues were “issues” for the organisations listed, from an *organisational perspective*, by applying definitions used in this study for “issue” and “issue management” (see Chapter 2 – Definitions). Data for this table is taken from: the interviews, media analysis, and broader research and textual analysis of secondary materials.

	Cost – CBA	Build – asbestos	Security – Huawei	Digital divide	Regulatory settings – structural separation	Content – copyright
<b>ALP</b>	<ul style="list-style-type: none"> <li>CBA, or a lack thereof, could impact the ALP by exposing the ALP and the NBN project to criticism. There was an expectation that a CBA would be undertaken for a project of this size.</li> </ul>	<ul style="list-style-type: none"> <li>Damaging issue for the ALP, because it could be presented as a sign of a failing NBN rollout. Additionally, the public would expect the ALP to oversight nbn to prevent risk to workers, to there was an expectation gap.</li> </ul>	<ul style="list-style-type: none"> <li>This was an unsettled matter which could affect the interests of the ALP. Huawei campaigned to be part of the build, and the government would have to explain to the electorate why Huawei had not been included – particularly as they had a strong price proposition.</li> </ul>	<ul style="list-style-type: none"> <li>Philosophically the ALP saw the NBN as a project that could help address the digital divide. Constituents would arguably expect the ALP to develop policy settings that would ensure the NBN could achieve equitable, fair access to telecommunications across Australia.</li> </ul>	<ul style="list-style-type: none"> <li>Achieving optimal regulatory settings was an ongoing issue for the ALP. Its stakeholders and constituents would expect the ALP to help create a policy environment conducive to affordable broadband.</li> </ul>	<ul style="list-style-type: none"> <li>This was an issue for the ALP, in its work to help strike a balance between user and owner rights. However, it was viewed in the context of obligations on rights holders to make content available expeditiously, conveniently and at a reasonable price point.</li> </ul>
<b>Liberal Party</b>	<ul style="list-style-type: none"> <li>Lack of a CBA was positive in that it provided a ready criticism of the NBN project. Successfully prosecuting this argument could contribute to political success for the Liberal Party.</li> </ul>	<ul style="list-style-type: none"> <li>This had capacity to positively affect the Liberal Party, in that they could frame this in terms of an ALP failure to oversight the build.</li> </ul>	<ul style="list-style-type: none"> <li>The Liberal Party positioned itself to review the ALP’s decision to refuse Huawei the opportunity to be part of the build. This was to meet a public expectation that they could build the NBN more cheaply, and so the issue of whether to include Huawei could impact the Liberal Party.</li> </ul>	<ul style="list-style-type: none"> <li>The Liberal Party saw the NBN as helping to address the digital divide, particularly for rural customers. They saw addressing the divide as important to NBN policy settings around price and accessibility, and their stakeholders (e.g. in the National Party) would expect them to develop NBN policy that would address this.</li> </ul>	<ul style="list-style-type: none"> <li>As with the ALP, the structural separation of Telstra was an issue for the Liberal Party to manage. Stakeholders would have expectations about how structural separation would be achieved, which the Liberal Party would have to address.</li> </ul>	<ul style="list-style-type: none"> <li>An issue for the Liberal Party in that they knew it would be necessary to find a solution to ongoing copyright infringement of music, video and software in Australia. The was this was addressed could have an effect on voters.</li> </ul>
<b>nbn</b>	<ul style="list-style-type: none"> <li>The high cost of the NBN and the lack of a CBA was a weakness for nbn, in that it went to the heart of the NBN business case.</li> </ul>	<ul style="list-style-type: none"> <li>A damaging issue, although nbn could direct queries to Telstra (Anon 14). Stakeholders would expect nbn to manage the build, so depending on how the issue developed, it could create an expectation gap.</li> </ul>	<ul style="list-style-type: none"> <li>nbn saw this as an issue for government, but it was still an issue for nbn because it affected pricing, and potentially also underlying infrastructure security. There was an expectation on the part of nbn’s stakeholders that they would treat all market players fairly.</li> </ul>	<ul style="list-style-type: none"> <li>nbn viewed addressing the digital divide as a part of their core mission with building the NBN, and so this influenced internal policy and engineering decisions in the build. Further, the extent to which they addressed the divide would have implications for their ongoing resourcing and strategic interests.</li> </ul>	<ul style="list-style-type: none"> <li>Regulatory settings, and the structural separation of Telstra (with its sale of the copper network) was central to nbn’s ongoing ability to operate and ultimately be profitable.</li> </ul>	<ul style="list-style-type: none"> <li>This was not a significant issue for nbn.</li> </ul>

	<b>Cost – CBA</b>	<b>Build – asbestos</b>	<b>Security – Huawei</b>	<b>Digital divide</b>	<b>Regulatory settings – structural separation</b>	<b>Content – copyright</b>
<b>DoC</b>	<ul style="list-style-type: none"> <li>In going to the business case, this was an issue because the DoC has not conducted a CBA, which would likely be a public expectation.</li> </ul>	<ul style="list-style-type: none"> <li>This affected the DoC to the extent it was providing policy oversight for nbn and the project.</li> </ul>	<ul style="list-style-type: none"> <li>In conjunction with the AGD, PM&amp;C and intelligence and security agencies, the DoC had to work with government on advising as to whether government should include Huawei. Stakeholders (including Huawei) had an expectation for them to proceed on the basis of fairness and EBP.</li> </ul>	<ul style="list-style-type: none"> <li>Setting NBN policy, digital divide was an issue for the DoC because it underpinned many policy choices about the NBN – how it would be rolled out, where it would be rolled out first, stakeholder management etc.</li> </ul>	<ul style="list-style-type: none"> <li>This was an unsettled matter for the DoC in providing advice to government on appropriate policy settings for the structural separation of Telstra, the <i>Migration Plan</i> and nbn.</li> </ul>	<ul style="list-style-type: none"> <li>This was not a major issue for the DoC over the time period examined for this study (it was later). It was ultimately also an issue for AGD.</li> </ul>
<b>ACCC</b>	<ul style="list-style-type: none"> <li>Not an issue for the ACCC.</li> </ul>	<ul style="list-style-type: none"> <li>An issue only in that the regulator could be expected to assist in creating a regulatory environment that managed the safe and legal conduct of telecommunications companies.</li> </ul>	<ul style="list-style-type: none"> <li>This was not a significant issue for the ACCC, other than in terms of the regulatory implications (which did not come to bear).</li> </ul>	<ul style="list-style-type: none"> <li>This was not a major issue for the ACCC, which saw it as more of a policy issue for government.</li> </ul>	<ul style="list-style-type: none"> <li>ACCC was involved in many regulatory settings issues. Policy was usually set at the executive (ALP, Liberal Party) or departmental level. The ACCC was affected in its enforcement of regulatory aspects (e.g. SAU and SSU).</li> </ul>	<ul style="list-style-type: none"> <li>Not a significant issue for the ACCC.</li> </ul>
<b>ACCAN</b>	<ul style="list-style-type: none"> <li>Not a central issue, but problematic because lack of CBA could undermine the legitimacy of the NBN project. Abandoning the NBN could adversely affect ACCAN members and stakeholders, thereby affecting the functioning and interests of ACCAN.</li> </ul>	<ul style="list-style-type: none"> <li>Could affect ACCAN in that its members would likely support the project, and would expect ACCAN to contribute to a policy environment that supported a successful and expeditious rollout.</li> </ul>	<ul style="list-style-type: none"> <li>This was not a significant issue for ACCAN, although it could affect NBN affordability.</li> </ul>	<ul style="list-style-type: none"> <li>This was a central issue for ACCAN, as a consumer advocacy organisation, its stakeholders had an expectation that it would advocate for their interests in the NBN build and contribute to policy settings that helped the NBN rollout address multiple digital divides.</li> </ul>	<ul style="list-style-type: none"> <li>Getting the regulatory settings right was important to ACCAN. This would help facilitate widespread access to affordable, quality broadband connections for Australian consumers, particularly for those on low incomes. Achieving good policy and regulatory settings for communications policy in Australia is central to ACCAN's goals.</li> </ul>	<ul style="list-style-type: none"> <li>Copyright was an unsettled matter, that could affect ACCAN members' interests. In particular, ACCAN sought to help broker consensus on an appropriate government response, which could include graduated response.</li> </ul>

	<b>Cost – CBA</b>	<b>Build – asbestos</b>	<b>Security – Huawei</b>	<b>Digital divide</b>	<b>Regulatory settings – structural separation</b>	<b>Content – copyright</b>
<b>Communications Alliance</b>	<ul style="list-style-type: none"> <li>This issue had mixed implications for members, so many would have differing expectations about how Comms Alliance should respond.</li> </ul>	<ul style="list-style-type: none"> <li>With Telstra being a key member, the issue was potentially damaging for the Comms Alliance.</li> </ul>	<ul style="list-style-type: none"> <li>As Huawei was an equipment supplier for Communications Alliance members, and a member, Huawei (and other stakeholders) expected Comms Alliance to fairly represent Huawei’s interests, in balance with other suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>Comms Alliance saw this as an issue because of their role broader role supporting the development of communications infrastructure, which for them would also help address the digital divide. This also went to debates about the cost of the NBN and the CBA.</li> </ul>	<ul style="list-style-type: none"> <li>Across a number of sub-issues, the regulatory settings for the NBN were an issue for Comms Alliance members. It was a significant issue for Telstra, but also for other members. Creating a competitive environment was a prerogative of a number of Comms Alliance members, who would expect Comms Alliance to further their strategic interests (with consensus).</li> </ul>	<ul style="list-style-type: none"> <li>Comms Alliance members expected Comms Alliance to advocate for an industry-led model for deterring copyright infringement. For Comms Alliance this was an issue, because it could result in significant enforcement costs if a regime was imposed.</li> </ul>
<b>CCC</b>	<ul style="list-style-type: none"> <li>Lack of CBA could undermine the NBN, which could threaten the structural separation and market elements of the NBN proposal. This could damage members’ interests, who were largely in favour of structural separation.</li> </ul>	<ul style="list-style-type: none"> <li>Telstra is not a member of the CCC, so it was not a significant issue for the CCC.</li> </ul>	<ul style="list-style-type: none"> <li>This was an issue for members in relation to the market for supplying NBN equipment and involvement in the build.</li> </ul>	<ul style="list-style-type: none"> <li>Digital divide was an issue for the CCC to the extent that it was perceived as a result of structural competition problems in the market. It was central to the question of disadvantage for regional consumers.</li> </ul>	<ul style="list-style-type: none"> <li>Broader regulatory settings were an underlying issue for the CCC, as members saw getting broadband regulatory settings right as key to enabling a competitive, open market, in which they could successfully compete against incumbents.</li> </ul>	<ul style="list-style-type: none"> <li>A relevant issue for the CCC in the ways it could lead to the government imposing a copyright enforcement regime, which arguably rights holders should contribute to.</li> </ul>
<b>Telstra</b>	<ul style="list-style-type: none"> <li>The cost of the NBN was an ongoing factor in negotiations over the government purchasing Telstra’s copper network. Telstra would be expected to maximise the financial return on this purchase for its shareholders.</li> </ul>	<ul style="list-style-type: none"> <li>A reputationally damaging issue for Telstra. Telstra’s stakeholders expected Telstra to oversight contractors and ensure they were safe, to continue an effective rollout. Delays could affect Telstra’s financial interests.</li> </ul>	<ul style="list-style-type: none"> <li>It was not a significant issue for Telstra, other than the effect on the market of Huawei’s inclusion/exclusion.</li> </ul>	<ul style="list-style-type: none"> <li>Telstra positioned itself as helping to address the digital divide, particularly with regional consumers.</li> </ul>	<ul style="list-style-type: none"> <li>Regulatory issues, particularly structural separation, had huge implications for Telstra. Telstra would be expected to act in the best interests of its shareholders, so how a number of regulatory issues were being managed was a strong focus for Telstra.</li> </ul>	<ul style="list-style-type: none"> <li>This was an issue in that Telstra did not wish to have a government-imposed system applied, which could see enforcement (and potentially collection) costs shifted from rights holders to carriers.</li> </ul>
<b>Optus</b>	<ul style="list-style-type: none"> <li>The lack of a CBA, in bringing the NBN project into question, could impact Optus – which stood to gain from a more competitive market.</li> </ul>	<ul style="list-style-type: none"> <li>Not of major concern to Optus, other than its potential to affect reputations of carriers overall. Telstra was Optus’ largest competitor, so it could have presented an opportunity on some level.</li> </ul>	<ul style="list-style-type: none"> <li>This was an issue for Optus in their use of Huawei equipment. So criticism of Huawei could affect Optus stakeholder expectations – in that stakeholders would expect Optus to comply with Australian Government security requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Like Telstra, Optus also saw itself as helping to address the digital divide, so this was an ongoing external issue, or unsettled matter, that Optus saw itself as helping to resolve. Its customers would expect it to help achieve this.</li> </ul>	<ul style="list-style-type: none"> <li>The regulatory environment, particularly with access to the NBN, was an issue for Optus. Optus, through public submission processes contributed to the management of regulatory issues and their course in the public sphere.</li> </ul>	<ul style="list-style-type: none"> <li>As with other carriers, Optus did not want enforcement costs shifted from rights holders to carriers.</li> </ul>

	<b>Cost – CBA</b>	<b>Build – asbestos</b>	<b>Security – Huawei</b>	<b>Digital divide</b>	<b>Regulatory settings – structural separation</b>	<b>Content – copyright</b>
<b>iiNet</b>	<ul style="list-style-type: none"> <li>Lack of CBA weakened the NBN business case, affecting iiNet in that it supported the NBN project. Its stakeholders and shareholders would expect it to manage the issue towards a positive outcome with the continuance of the NBN project.</li> </ul>	<ul style="list-style-type: none"> <li>Not of major concern to iiNet, other than its potential to affect reputations of carriers overall.</li> </ul>	<ul style="list-style-type: none"> <li>Not a significant issue for iiNet.</li> </ul>	<ul style="list-style-type: none"> <li>iiNet saw itself as helping to address the digital divide, so this was an issue for iiNet (although ostensibly a positive one).</li> </ul>	<ul style="list-style-type: none"> <li>Like the carriers, ISPs would be affected by the regulatory settings surrounding the NBN – particularly regarding access to the NBN. Final determination of the regulatory environment for the NBN would affect iiNet’s strategic interests.</li> </ul>	<ul style="list-style-type: none"> <li>This was a significant issue for iiNet, particularly after they became embroiled in litigation which rights holders perceived as a test case. This was (and continues to be) a positive and negative issue for iiNet, as evidenced by interview data.</li> </ul>
<b>Alcatel-Lucent</b>	<ul style="list-style-type: none"> <li>No great impact, other than that they favoured the project because it meant commercial opportunities for the company.</li> </ul>	<ul style="list-style-type: none"> <li>No significant impact.</li> </ul>	<ul style="list-style-type: none"> <li>An issue in relation to how it would affect the market for supplying nbn for the build.</li> </ul>	<ul style="list-style-type: none"> <li>Alcatel-Lucent saw itself as helping to address the global digital divide, through provision of networking infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>As with other carriers, Alcatel-Lucent sought a market environment in which it could effectively do business. A number of policy decisions were being made on settings for the market.</li> </ul>	<ul style="list-style-type: none"> <li>Not a significant issue for Alcatel-Lucent.</li> </ul>
<b>Huawei</b>	<ul style="list-style-type: none"> <li>Supported the NBN project, due to the potential commercial windfalls.</li> </ul>	<ul style="list-style-type: none"> <li>No significant impact.</li> </ul>	<ul style="list-style-type: none"> <li>A significant issue for Huawei. Their stakeholders in China, and industry partners, wanted the company to be involved in the build. Huawei would be expected to strongly prosecute its case for inclusion. Equipment customers would expect Huawei to ensure there would be no security concerns in relation to the company whatsoever.</li> </ul>	<ul style="list-style-type: none"> <li>Huawei saw itself as globally contributing to addressing multiple digital divides, so in this sense this was a positive external issue for Huawei.</li> </ul>	<ul style="list-style-type: none"> <li>This was not an issue for Huawei once it was not able to participate in the build, other than through flow-on effects on other customers.</li> </ul>	<ul style="list-style-type: none"> <li>Not a significant issue for Huawei.</li> </ul>
<b>MRA</b>	<ul style="list-style-type: none"> <li>Not overly affected by the issue.</li> </ul>	<ul style="list-style-type: none"> <li>Not impacted by the issue.</li> </ul>	<ul style="list-style-type: none"> <li>Not a very significant issue for MRA.</li> </ul>	<ul style="list-style-type: none"> <li>Not a very significant issue for MRA, although addressing the divide could open up additional, broader markets for MRA members.</li> </ul>	<ul style="list-style-type: none"> <li>Not a significant issue for MRA.</li> </ul>	<ul style="list-style-type: none"> <li>This was a major issue for MRA, as it directly affected the interests of members. Ongoing copyright infringement was arguably costing the music and content industries in lost revenue, and so helping to establish a means to address this way to MRA’s broader policy and advocacy effort.</li> </ul>
<b>IBES</b>	<ul style="list-style-type: none"> <li>Lack of a CBA could affect the existence of the NBN project, and in turn, IBES itself.</li> </ul>	<ul style="list-style-type: none"> <li>Detracted from the overall goals of the NBN, and potentially damaged the reputation of nbn and public perceptions of the rollout generally. Could indirectly be negative for IBES.</li> </ul>	<ul style="list-style-type: none"> <li>Huawei’s involvement in the NBN build was relevant to research, modelling and costing undertaken by IBES.</li> </ul>	<ul style="list-style-type: none"> <li>IBES saw the NBN as helping to address a number of digital divides, so research and IBES’ goals were tied to maximising the NBN’s ability to help address this and related issues.</li> </ul>	<ul style="list-style-type: none"> <li>IBES was not closely involved in the regulatory debate, being a research institute. However, the final regulatory landscape would have implications for IBES’ research and modelling.</li> </ul>	<ul style="list-style-type: none"> <li>Not a major issue for IBES.</li> </ul>

	<b>Cost – CBA</b>	<b>Build – asbestos</b>	<b>Security – Huawei</b>	<b>Digital divide</b>	<b>Regulatory settings – structural separation</b>	<b>Content – copyright</b>
<b>TPG</b>	<ul style="list-style-type: none"> <li>• Not an issue for TPG.</li> </ul>	<ul style="list-style-type: none"> <li>• Not an issue for TPG.</li> </ul>	<ul style="list-style-type: none"> <li>• Not an issue for TPG.</li> </ul>	<ul style="list-style-type: none"> <li>• An issue to the extent that TPG could help address the digital divide, along with other ISPs.</li> </ul>	<ul style="list-style-type: none"> <li>• A significant issue for TPG, particularly around FTTB and regulations on cherry-picking of lucrative urban fibre services. TPG sought to extend existing fibre services, arguably in competition with nbn.</li> </ul>	<ul style="list-style-type: none"> <li>• Not perceived as an issue for TPG.</li> </ul>

## APPENDIX 19 – Interviewee sampling parameters

The following parameters were applied in selecting interviewees for this study.

Settings	<ul style="list-style-type: none"> <li>• IM roles or functions within organisations.</li> <li>• Government, NGO, corporate, advocacy, political environments.</li> <li>• Weighting towards senior executives.</li> </ul>
Actors	<ul style="list-style-type: none"> <li>• Issue managers.</li> <li>• Public affairs advisers.</li> <li>• Lobbyists.</li> <li>• Policy and political advisers.</li> <li>• Key government policy figures.</li> <li>• PR, communications executives.</li> </ul>
Events, activities	<ul style="list-style-type: none"> <li>• Engagement in, overseeing or directing IM activities: for example issuing media releases, lobbying, commissioning reports, meeting stakeholders, advocacy, media statements, submissions to government inquiries etc.</li> <li>• Prefer high-level (e.g. CEO, public affairs executive) involvement on the part of the organisation.</li> </ul>
Issues	<ol style="list-style-type: none"> <li>1. Cost (CBA).</li> <li>2. Building the NBN (asbestos).</li> <li>3. National security (Huawei).</li> <li>4. Digital divide.</li> <li>5. Regulatory settings (structural separation).</li> <li>6. Content (copyright).</li> </ol>
Time	<ul style="list-style-type: none"> <li>• Engagement in NBN related issues in their role, preferred coverage during at least part of the time periods set out in <b>Appendix 12 – Issue salience data</b>.</li> </ul>
Materials, artefacts	<ul style="list-style-type: none"> <li>• IM advice, briefs, papers.</li> <li>• Media releases.</li> <li>• Organisational submissions to inquiries, hearings etc.</li> </ul>

## APPENDIX 20 – Issues and influences matrix

This table indicates codes common to issue nodes and to influence on debate and policy nodes.

This was used to identify specific instances where interviewees perceived that IM practices influenced debate and/or public policy.

(Category nodes are not aggregated)

	Debate impacting policy	Positive impact on debate	IM practice linked to impact on policy	Change policy	Creation of new policy	Maintain policy
<b>Build</b>	1	0	0	0	0	0
Aerial deployment	0	0	0	1	0	0
Asbestos	0	3	0	4	0	0
Battery backup	3	3	3	3	1	0
Choice of tech	0	3	0	0	0	3
Delay	0	1	0	1	0	0
Disconnection	0	0	0	0	0	0
Job security at nbn	0	0	0	0	0	0
Opt-out, deferral	0	0	0	0	0	0
Quigley Costa Rica	0	0	0	0	0	0
<b>Content</b>	0	0	0	0	0	0
Copyright	0	1	3	1	0	0
Licensing	0	0	0	0	0	0
What to use the NBN for	0	0	0	0	2	0
<b>Cost</b>	0	1	0	0	0	0
Cost-benefit analysis	2	3	1	0	0	1
<b>Digital divide</b>	0	6	0	0	0	0
Country vs city	0	0	0	1	0	1
Old vs young	0	0	0	0	0	0
Tenant consent	0	0	0	0	0	0
<b>Regulatory settings</b>	0	0	1	0	0	0
Black spots	0	1	2	0	0	0
Competition protection	0	0	0	1	0	0
Cherry-picking	1	0	1	1	0	0
Migration Plan	0	0	0	0	0	0
Pricing	0	1	1	0	1	0
QoS, capacity	0	2	1	0	0	0
SAU	1	2	3	3	2	0
Structural reform	0	1	0	0	1	0
Structural separation	3	3	3	1	3	0
Existence of the NBN	0	0	0	0	2	0
SSU	0	0	0	0	1	0
USO	0	0	0	0	0	1
<b>Security</b>	0	0	0	0	0	0
Huawei	0	1	0	0	0	0

## APPENDIX 21 – Practices and influences matrix

The following three tables set out the results of matrix coding.

**Table A2** uses a matrix based on ‘NEAR content’, with ‘overlapping proximity’. That is, this shows direct overlaps in codes, where text overlaps across a type of practice and an impact on debate or policy. This is the most accurate of the three tables, but also the most limited. This was the primary table drawn on for data analysis.

**Table A3** uses a matrix based on ‘NEAR content’, including a distance of up to 40 words between references. This will capture a scenario where an interviewee is discussing a particular practice, then goes on later in the interview transcript to discuss the effectiveness of that practice(s). This is a less precise means of matching practices to impacts, because although it is likely the interviewee will be discussing the impact of the practice, s/he could equally be discussing the impact of a separate practice or a group of practices raised much earlier in the interview.

**Table A4** is the least accurate representation of this relationship on the data between specific practices and their IM impacts. It uses a ‘NEAR content’ based search, including a distance of up to 80 words between references. It uses the same approach as in **Table A2** and has a greater span.

**Tables A3** and **A4** at best only show likely associations between specific practices and impacts on the public debate or policy.

For all three tables **A2 – A4** empty/null rows have been removed, and all practice nodes, including category nodes (in bold, e.g. “IN PERSON”), are aggregated.

**Table A2. Matrix code, near content with overlapping proximity**

	Debate impacting policy	Positive impact on debate	IM practice linked to impact on policy	Change policy	Creation of new policy	Maintain policy
Advertising	0	1	0	0	0	0
<b>IN PERSON</b>	0	4	1	0	3	0
Briefings	0	0	1	0	0	0
1-1	0	0	1	0	0	0
Event	0	2	0	0	0	0
Launch	0	0	0	0	1	0
Meeting	0	1	0	0	1	0
Discussions	0	0	0	0	1	0
Parliamentary committee	0	1	0	0	0	0
Speech	0	1	0	0	1	0
Information paper (ACCC)	0	1	0	0	0	0
<b>MEDIA</b>	0	2	0	0	0	0
Interview, comment	0	2	0	0	0	0
Letter to the editor	0	1	0	0	0	0
<b>MEDIATED 1-1</b>	0	1	0	0	0	0
Phone call	0	1	0	0	0	0
<b>MEDIATED 1-MANY</b>	0	2	0	0	0	0
Op-ed	0	1	0	0	0	0
Policy, position statement	0	1	0	0	0	0
Neutralising issue cause	0	2	0	0	0	0
<b>Provide information</b>	0	3	0	0	0	0
Reasons, explanation	0	1	0	0	0	0
<b>Research</b>	0	1	0	0	0	0
Report	0	1	0	0	0	0
<b>Submission to, into</b>	0	1	1	0	1	0
Minister	0	0	0	0	1	0
Working with partners	0	1	0	0	0	0

**Table A3. Matrix code, near content within 40 word proximity**

	Debate impacting policy	Positive impact on debate	IM practice linked to impact on policy	Change policy	Creation of new policy	Maintain policy
Advertising	0	2	0	0	0	0
<b>IN PERSON</b>	0	6	1	1	4	0
Briefings	0	0	1	1	0	0
1-1	0	0	1	0	0	0
Event	0	4	0	0	0	0
Public	0	1	0	0	0	0
Launch	0	0	0	0	2	0
Meeting	0	1	0	0	2	0
Discussions	0	0	0	0	1	0
Parliamentary committee	0	1	1	1	0	0
Senate Estimates	0	0	1	1	0	0
Speech	0	1	1	0	1	0
Incentivising choices	0	0	0	0	0	1
Information paper (ACCC)	0	1	0	0	0	0
Issue strategy	0	1	0	0	0	0
Keeping quiet	0	1	0	0	0	0
<b>MEDIA</b>	0	3	1	1	0	0
Interview, comment	0	2	0	0	0	0
Letter to the editor	0	1	0	0	0	0
Talk to journo	0	1	1	1	0	0
1-1 briefings	0	0	0	1	0	0
Backgrounding	0	1	0	0	0	0
<b>MEDIATED 1-1</b>	0	1	0	0	0	0
Phone call	0	1	0	0	0	0
<b>MEDIATED 1-MANY</b>	0	3	0	0	0	0
External newsletter	0	1	0	0	0	0
Op-ed	0	1	0	0	0	0
Policy, position statement	0	1	0	0	0	0
Neutralising issue cause	0	2	0	0	0	0
Phase creation	0	0	0	0	1	0
<b>Provide information</b>	0	4	0	0	0	0
Reasons, explanation	0	3	0	0	0	0
<b>Research</b>	0	3	0	0	0	0
Report	0	3	0	0	0	0
<b>Social media</b>	0	2	0	0	0	0
Tweet	0	2	0	0	0	0
<b>Submission to, into</b>	0	1	2	0	1	0
Document, white paper, report	0	0	1	0	0	0
Minister	0	0	0	0	1	0
<b>Third party advocacy</b>	0	3	0	0	0	0
Champions	0	1	0	0	0	0
Working with partners	0	1	0	0	1	0

**Table A4. Matrix code, near content within 80 word proximity**

	Debate impacting policy	Positive impact on debate	IM practice linked to impact on policy	Change policy	Creation of new policy	Maintain policy
Advertising	0	2	0	0	0	0
Announcements	0	1	0	0	0	0
<b>IN PERSON</b>	0	7	1	1	4	0
Briefings	0	0	1	1	0	0
1-1	0	0	1	0	0	0
Event	0	4	0	0	0	0
Public	0	1	0	0	0	0
Launch	0	1	0	0	2	0
Meeting	0	1	0	0	2	0
Discussions	0	0	0	0	1	0
Parliamentary committee	0	1	1	1	0	0
Senate Estimates	0	0	1	1	0	0
Speech	0	1	1	0	1	0
Incentivising choices	0	0	0	0	0	1
Information paper (ACCC)	0	1	0	0	0	0
Issue strategy	0	1	0	0	0	0
Keeping quiet	0	1	0	0	0	1
<b>MEDIA</b>	1	4	2	1	0	0
Interview, comment	1	3	0	0	0	0
Letter to the editor	0	1	0	0	0	0
Story, story submission, article	0	0	1	0	0	0
Talk to journo	0	1	1	1	0	0
1-1 briefings	0	0	0	1	0	0
Backgrounding	0	1	0	0	0	0
<b>MEDIATED 1-1</b>	0	1	0	0	0	0
Phone call	0	1	0	0	0	0
<b>MEDIATED 1-MANY</b>	1	3	1	0	0	0
External newsletter	0	1	0	0	0	0
Op-ed	1	1	1	0	0	0
Policy, position statement	0	1	0	0	0	0
Neutralising issue cause	0	2	0	1	0	0
Phase creation	0	0	0	0	1	0
<b>Provide information</b>	0	5	0	3	0	0
Reasons, explanation	0	3	0	1	0	0
<b>Research</b>	0	4	0	0	0	0
Report	0	3	0	0	0	0
Study, project	0	1	0	0	0	0
<b>Social media</b>	0	2	0	0	0	0
Tweet	0	2	0	0	0	0
<b>Submission to, into</b>	1	1	2	0	1	0
Document, white paper, report	0	0	1	0	0	0
Minister	0	0	0	0	1	0
<b>Third party advocacy</b>	0	3	0	0	0	0
Champions	0	1	0	0	0	0
Using key influencers (in agency)	0	1	0	0	0	0
Working with partners	0	1	1	0	1	0

## APPENDIX 22 – All IM practices

The following table shows all IM practices in ascending frequency order. “Sources” refers to the number of interview transcripts from separate interviewees the code covers. “Nodes” refers to the number of references/codes at that node. No nodes are aggregated.

Shading indicates primary categories of practice (e.g. in person, mediated 1-1, mediated 1-many, media).

Legend showing node categories

In person
Mediated 1-1
Mediated 1-many
Media

IM practice	References	Sources
Workshop	1	1
Symposium	1	1
Industry forums	1	1
Event – TV	1	1
Demonstration – Take journo to site	1	1
Promotional truck	1	1
Attending	1	1
Question Time	1	1
Social media – LinkedIn	1	1
Social media – YouTube	1	1
Articles	1	1
Infographic	1	1
Discussion paper	1	1
Plan	1	1
Teleconference	1	1
Book	1	1
TV show	1	1
Recommendations	1	1
Annual report	1	1
Journal article	1	1
Research – Support partners	1	1
Research – Targeted consultation	1	1
Public comment	1	1
Create research body	1	1
Talk to journo – Yelling	1	1
Radio	1	1
TV	1	1
Doorstop	1	1

IM practice	References	Sources
Access to SME	1	1
Prepare talking points	1	1
Announcement	1	1
Phase creation	1	1
Co-ordinating disparate interests	1	1
Rebranding	1	1
Using key influencers (in agency)	1	1
Listening	1	1
Channelled complaints	1	1
Projecting authority & seriousness	1	1
Advertising – Brochure	1	1
Advertising – Political	1	1
CSR	1	1
CSR – Funding	1	1
CSR – Equipment	1	1
Submissions – Consultations	1	1
Give stakeholders forewarning of negative	1	1
Give stakeholders forewarning of negative – Show drafts	1	1
Information paper (ACCC)	1	1
Incentivising choices	1	1
Project launch	1	1
Consensus building	1	1
Repositioning	1	1
Expert	1	1
External customer engagement – Emails	1	1
Crisis planning	1	1
Establish working groups	1	1
Private members bill	1	1

IM practice	References	Sources
Propose review	1	1
Issues tracking – Issues audit	1	1
Trials	1	1
Meeting – 1-1	2	2
Event – Public	2	1
Open day	2	2
Brief the MP	2	1
Panel	2	2
Briefings – 1-1	2	1
Social media	2	2
Social media – Message boards (e.g. Whirlpool)	2	1
Third party advocacy – Champions	2	2
Video	2	2
Information, fact sheet	2	2
Brochure	2	1
Online apps	2	2
Research – White paper	2	2
Research – Paper	2	1
Research – Academic publications	2	1
Talk to journo – 1-1 briefings	2	1
Statement	2	2
Letter to the editor	2	2
Prepare Q&As in advance	2	1
Issue strategy	2	2
Information gathering	2	1
Submissions – Minister	2	2
Submissions – Senate	2	1
Expert – Engage expert	2	2
Expert – Defer to expertise	2	2
Propose policy solution	2	1
External customer engagement	2	2
Database, register – Issue	2	2
Internal relationship building	2	1
Issues tracking	2	1
Launch	3	1
Doorknocks	3	2
Parliamentary debates	3	2
Social media – Facebook	3	3
Email	3	2
Comments on other websites	3	2
Comments on other websites – Online discussion forums	3	1
Announcements	3	2
Submissions – Review	3	2
Database, register – Risk	3	1

IM practice	References	Sources
Internal comms	3	2
Conference	4	4
Meeting – Discussions	4	3
Facilities tour	4	1
Blog	4	2
Interview, comment – Response	4	2
Community engagement	4	2
Forum	5	3
Alliances	5	4
External newsletter	5	3
Advertising	5	4
Submissions – Parliamentary inquiry	5	1
Input on legislation, regulations	5	3
Briefings	6	1
Talk to journo	6	5
Parliamentary committee – Senate Estimates	7	3
Letter	7	5
Website	7	6
Presentations	8	6
Neutralising issue cause	8	4
Event	9	5
Seminar	9	4
Social media – Tweet	9	5
Op-ed	9	5
Policy, position statement	9	5
Research – Study, project	9	4
Submissions – Document, white paper, report	9	5
Third party advocacy	10	4
Phone call	10	5
Parliamentary committee	11	6
Research	11	4
Demonstration	12	5
Research – Report	12	5
Story, story submission, article	14	6
Provide information – Reasons, explanation	14	6
Media release	15	9
Talk to journo – Backgrounding	15	5
Working with partners	22	7
Keeping quiet	22	8
Speech	24	10
Interview, comment	24	13
Provide information	27	9
Submissions	27	6
Meeting	33	11

## APPENDIX 23 – Social media IM

Commentators argue that IM needs to account for the development of electronic PR. Galloway describes part of the shift to online in the context of chat rooms and their use as a location to identify emergent issues:

Online press conferences were held and some companies began monitoring online chat groups where discussions could highlight an emerging issue that might affect their business. E-PR was used alongside traditional public relations approaches in campaign implementations. (Galloway 2006a, p. 3)

The advent of mobility and greater mobile penetration means issue managers can use these channels to respond to developing issues quickly, and as a communication channel to reach target publics in real-time. Mobile PR could be viewed as an extension of electronic PR, with Galloway providing the following Table A5 comparing mobile and electronic PR (Galloway 2006a, p. 4):

**Table A5. Electronic & mobile PR**

<b>Mobile PR</b>	<b>“Traditional” electronic PR</b>
Consumers access cyberspace from mobile devices	Consumers access cyberspace from fixed devices
Target publics form fluid communities linked by mobile communication	Target publics self-select by “pulling” information to themselves
Messages abbreviated, “burst-y”, often in TXT and symbols – “emoticons”	Messages use symbols and plain text; facility for delivery of extensive content
Devices allow multimedia experience	Multimedia delivered via fixed devices
Demand to satisfy emotional needs such as sense of involvement is a strong driver for relationship formation	Greater opportunity to influence relationships with rationales for advocacy positions

*Source: Galloway (2006a, p. 4)*

There has been growing analysis of the role of IM in social media and technology PR. This has focused on specific lessons for issues managers operating in the online space, and some bears correlation with earlier writing on ‘issue contagions’, and the unique way the internet affects the issues lifecycle (Coombs 2002, p. 216). This has particular relevance to this study, because many stakeholders in the public debate were highly tech-savvy.

Malcolm Turnbull, Minister for Communications (or someone from his office), tweeted as shown in Figure A2 (overleaf).



Figure A2. Tweet from Malcolm Turnbull

This tweet resulted in significant negative media attention for the Minister (e.g. Mills 2014). The Minister, using his blog, responded as set out in Figure A3 below.



Figure A3. Malcolm Turnbull's website (Turnbull 2014c)

When Anon 19, a Coalition adviser, was asked about this example during the interview, he pointed to a lack of representativeness in online debates:

It was gone the next day. Did anyone who used to think Malcolm was a great guy and who really liked the way that he engaged with people on twitter and after that could never forgive him for his rudeness to that poor lady, did that have an effect like that for anyone in Australia?... Maybe there's five people, maybe there's 500, maybe there's 5,000, but I don't think it was 5,000.

Some cohort of people would have been changed in their views, but when he took on Alan Jones the other week he probably got... 10 times more incomings than he got outgoings from the tweet. (2014, pers. comm.)

Anon 19 exhibited borderline hostility towards social media in certain circumstances, which contrasted strongly with other interview data, particularly that of Dalby and Rhodie, who were both heavily involved in the management of social media communications for their organisations. Rhodie regularly engaged in forums where the NBN was being discussed, finding it valuable for IM.

When a discussion's happening it's good to go out and get to them wherever they are, rather than just hoping they'll come to you... And we found that quite a lot of that was... beneficial to the organisation, people felt that they were being listened to...

There was a conversation on Vogue Forums for instance... There was a conversation in car a discussion forum. All over people were discussing it... I had Google Alert set up. I had web monitoring software obviously so we could dip in and look at what was being used. (nbn, Rhodie 2014, pers. comm., 5 September)

The greater level of noise and potential inaccuracy in online forums can compound the challenges issue managers face in these environments. Curran, Fenton and Freedman are critical of democratic elements of online discussions, and they highlight a lack of balance and representativeness:

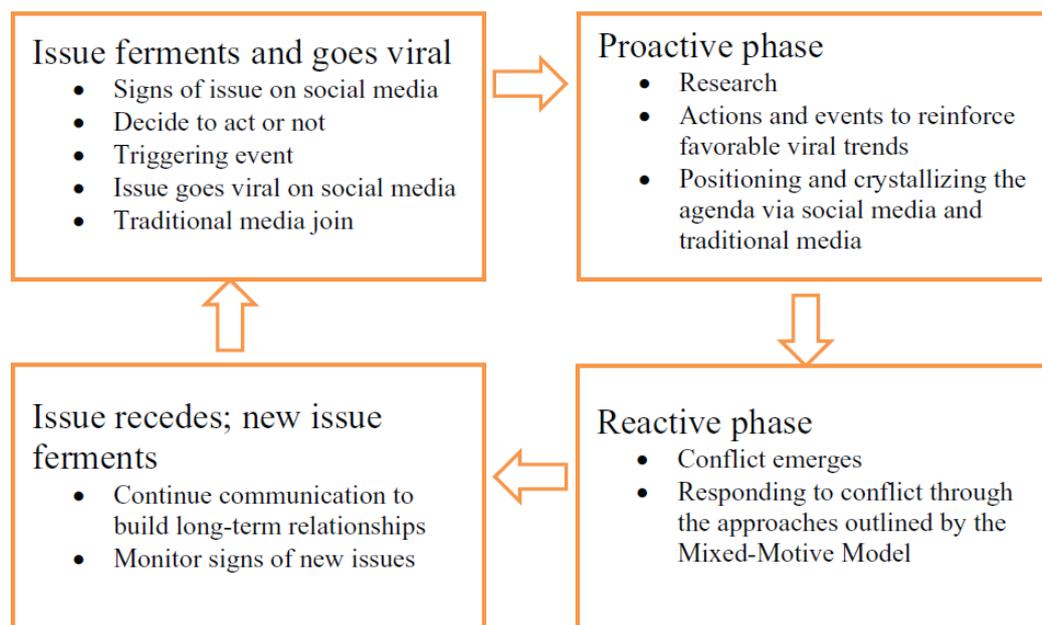
Firstly... a huge amount of noise and (false) information generated by networks can make it difficult to separate the authentic from the deliberately placed. Secondly, social media sites are not concerned first and foremost with balance... And thirdly, social media tend to amplify inaccuracies, as speed generates its own momentum and networks endlessly repeat errors. (2012, p. 162)

Zhang emphasises the growing role of social media in public diplomacy, and many similar traits and techniques have been employed to prosecute NBN arguments by the major stakeholders in the debate. Risks exist in the social media component of the public sphere, 'as an external environment for public diplomacy, social media are uncharted waters' (Zhang 2013, p. 1313) and interview data confirmed some of the challenges Zhang outlines (e.g. Kaiser, Rhodie).

Social media is not only used to address issues in the public sphere, but can lead to the development of an issue, or enable it to spread more quickly than it otherwise would (Violi 2010; Zhang 2013). On occasion, public affairs advisers have attempted to manage issues using social media channels, only to have their interventions become crises in themselves (Capozzi & Rucci 2013).

Zhang suggests a four phase model of social media SIM in a public diplomacy context, which is useful when assessing the findings on social media IM in this study. Zhang notes that ‘in the issue fermenting and issue receding phases, however, social media may be tactical tools because they are mostly related to daily, routine, small-scale actions’ (2013, p. 1325).

Various strategies were employed by issue managers in Zhang’s research. For positive reinforcement of viral trends, these included: co-operation, unconditionally constructive, win-win. For responding to conflict, this included: contention, principled approach and compromise. The application of the SIM process to social media IM is set out below in Figure A4.



**Figure A4. Application of SIM to social media**  
*Source: Zhang (2013, p. 1326)*

Some of these approaches can be seen emerging from interview data in this study, with interviewees emphasising the role in social media in assisting the achievement of win-win scenarios. The predominant means of disseminating ongoing communication through social media is viral, but for Zhang, ‘it still needs the corroboration of traditional news media’ (2013, p. 1326).

Jaques discusses IM in a social media environment, with notions of ‘e-issue life cycles’ and ‘viral life cycles’ (2014, p. 41). He notes that ‘the life cycle principles remain largely unchanged – that issues progress along a continuum and become increasingly difficult to manage’ (p. 41), identifying specific differences between IM in a social media environment and a “traditional” approach to IM. Many of these were seen in the interview data and preceding chapters, particularly with Rhodie (nbn) and Anon 19 (Twitter scenarios):

- issues can escalate much faster and may be over more quickly
- multiple platforms increase media momentum and potential impact on the organisation
- there is a higher risk of synergy with, or contagion to, other issues
- damaging material can remain 'live' on the internet long after the issue's apparent resolution
- there are better opportunities for more and earlier participation, and
- more stakeholders can be reached quickly and easily. (2014, p. 41)

This list from Jaques could be extended by reference to real-time measurement. The speed of issue development in a social media environment means an issue manager can immediately see the impact of his or her IM practices on the issue through the use of social media analytics and monitoring. For example, metrics including retweets, YouTube views, Facebook "Likes" etc. can give an issue manager a sense of the current scale of the issue, and how online audiences are responding to practices being employed to manage the issue.

Rhodie gave detailed accounts of the use of environmental monitoring tools and feedback mechanisms employed by nbn:

What we tended to do is we did a lot of monitoring, so we used monitoring software to find out peaks and troughs of conversations, and then negative and positive sentiment... We'd be looking at conversations with NBN. Some weeks would be 4,000 conversations across forums, blogs, Twitter. Some weeks would be insane... We used BuzzNumbers at the beginning... we moved to Radian6, yeah. So they were the two that we mostly used, but we'd also have press clippings come in from... Media Monitors.

But for us it was always looking at daily data, and looking at how well we did, and how we were growing on social. And then obviously we built our EDMs as well... When I was there I built it from zero to 43,000 subscribers.

Twitter's great for instant. The moment we put something on the website, people don't know it's there, but the moment we shout out on Twitter to let people know it was there then they'd be hungry for it, and we'd see spikes in the website traffic. (Rhodie 2014, pers. comm., 5 September)

Other recent analysis of the use of social media strategies and their usefulness in crisis communications can be found in examination of the Fonterra response to its food contamination issue in 2013. For more analysis of the Fonterra IM example, see **Appendix 1 – IM case study comparisons**.

Fonterra's use of social media for CM and IM was criticised, having been found to be primarily designed for one-way communications:

Fonterra's Twitter use [of social media] was very narrowly focused on news and updates (88%), and for the most part used as an additional avenue for conventional public relations communication. None of Fonterra's tweets ranged outside its core business... There did not appear to be a targeted audience, nor was there any attempt to build awareness or develop any engagement with other users. (Edmonds 2013, p. 99)

The analysts who considered Fonterra's response were of the view that 'in a crisis a lack of a social media strategy and built capability can be costly in terms of both reputation and remedial opportunities' (Hallman, Cuite & Wu 2013, p. 97).

Because of Fonterra's lack of social media engagement, it was unable to engage with influencers in the online space. A number of recommendations were made to assist Fonterra in future social media crisis scenarios. These are of value when considering the social media strategies adopted by participants in the NBN debate (set out in **Appendix 23 – Social media IM**), and are:

- use best practice digital and social media strategy
- corporate digital strategy
- social media crisis plan – including a more comprehensive dialogue with stakeholders
- ghost website for use in a crisis
- social media protocol distributed to staff immediately after a crisis event
- FAQs
- co-ordinated social media platform updating
- establish a worksheet of keyword lists, hashtags and key influencers to information monitoring and content optimisation through a crisis
- online flagging system, and
- specialist social media monitoring agency on standby (Hodder, Trainor & Heida 2013).

Ott and Theunissen have also noted the particular reputation risks in poor social media engagement, with a review of three significant crises finding that:

...to whom and when the organization responded had a major impact on how the crises evolved... a dialogical approach is only effective if the users are affected by the crisis. If they are not, attempting to engage as many stakeholders as possible is likely to fuel anger... Reputational risk is further increased because programming algorithms favour posts with a high activity regardless whether such activity is positive or negative. (2015, p. 101)

However, analysts also note that social media platforms provide a valuable source of real-time feedback from stakeholders (Capozzi & Rucci 2013). Jordan-Meier (2011) writes that

social media is not a replacement for traditional media, but it does provide a complementary format, also requiring attention, which was borne out by the findings.

Other commentators note that addressing issues in general offline crisis communication correlates closely with addressing them in the realm of social media crisis communication (Veil, Buehner & Palenchar 2011), a view endorsed by Hallman, Cuite and Wu (2013). Equally, different user populations exist in the use of social media (Veil, Buehner & Palenchar 2011), and messaging needs to be tailored to these audiences to achieve effective communication. This was also confirmed in the findings for this study, with tailored approaches for social media platforms (e.g. Rhodie).

Stakeholders in the ICT debate, as well as being on social media, also use online forums for posting messages and engaging in discussion. This was prominently demonstrated with the Whirlpool forum, with iiNet stressing its importance as a site of debate, and a place to convey key messages to stakeholders:

Whirlpool's an amazing environment... The responses are just constant and... NBN is on its 42nd thread... Within the iiNet space, there are a number of threads talking about NBN issues, including that Senate paper that we put up. And that is monitored.

The reason that I personally continue to engage in Whirlpool is that I know that there is a broad readership that never post. So, most of the people that post are geeky, interested people, or they've got a particular issue that they want a response on. (Dalby 2014, pers. comm., 5 February)

Lagos, Coopman and Tomhave (2013) note that 'political actors and social activists have seized the internet as a primary weapon in dissemination of news and information otherwise not available to them... the internet provides a ready dissemination tool previously unavailable to generations of social activists' (p. 12). Jaques takes a similar view:

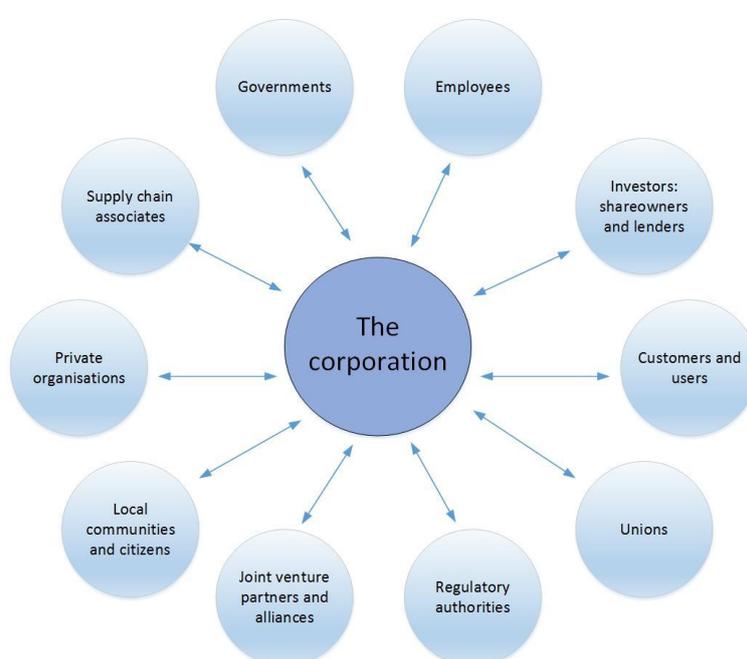
Social media has largely democratised the discipline by creating the capacity for individuals and community organisations to compete on a level playing field with big business and big government in identifying and engaging on issues...

The rise of the internet and social media has rapidly broadened the capacity of non-media organisations and individuals to set the agenda... These hitherto disadvantaged players can now readily elevate issues onto the public and media agenda in a way previously undreamed of, and can mobilise resources quickly and cheaply as never before (2014, pp. 2–39)

## APPENDIX 24 – Stakeholder analysis approaches

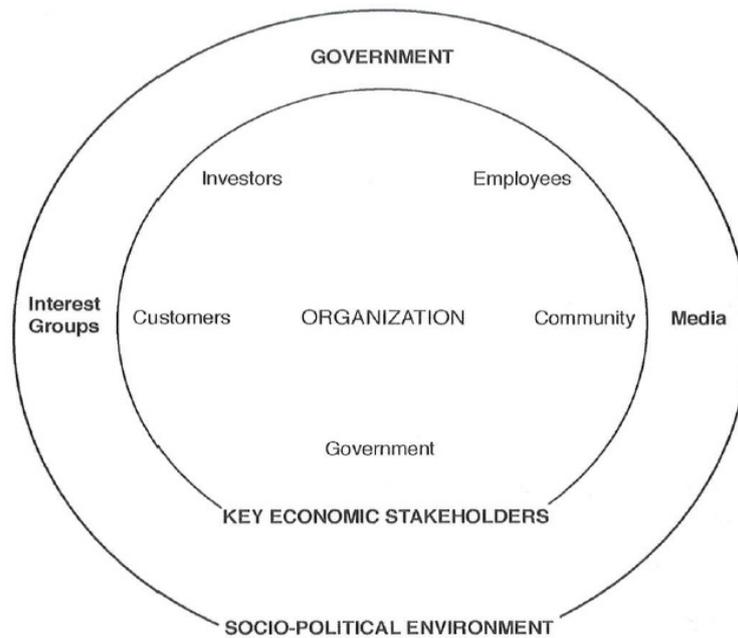
Stakeholder analysis can be conducted using varying approaches, with a commonly cited approach being Hallahan’s model (2000, in Table A1), that considers stakeholder levels of involvement and knowledge. A stakeholder with higher levels of knowledge is likely to be better able to prosecute its argument, and so more likely to articulately make representations in the public sphere. Other elements of stakeholders include their levels of legitimacy, power and urgency with respect to an issue.

Lerbinger considers the publics, or stakeholders, associated with an organisation in a public affairs context, and that can typically exert influence on the organisation (2006). Drawing on Post, Preston and Sachs (2002), he identifies a number of stakeholders that can typically influence an organisation, below in Figure A5.



**Figure A5. The corporation & its stakeholders**  
*Source: Post, Preston & Sachs (2002, p. 10)*

This model is supported by the findings of this study, with the corporation being any entity in the debate. Lerbinger, identifying economic and sociopolitical influencers, puts forward the following relational model (Figure A6 overleaf).



**Figure A6. Economic stakeholders in the sociopolitical environment**  
*Source: Lerbinger (2002, p. 9)*

Howell emphasises the need to engage with stakeholders to help protect reputation, ‘organisations concerned with the management of their reputation must monitor and track traditional media and an increasing number of new media sources, and be prepared to engage with a broader range of stakeholders than previously’ (2014, p. 194), which was borne out by interview data on environmental scanning, and employing tools for social media monitoring (e.g. Rhodie).

A more powerful stakeholder is likely to have greater potential influence on an issue, and more capacity to convey its messages in the debate. If a stakeholder has greater perceived legitimacy, this is likely to influence brand perception and position in the debate, with target publics placing greater weight on that stakeholder’s views.

Government agencies including ACMA and the DoC may benefit from a perception of heightened legitimacy in the public debate about NBN policy. Mitchell, Agle and Wood’s (1997) model goes some way to representing categories for NBN stakeholders (Figure A7 overleaf).

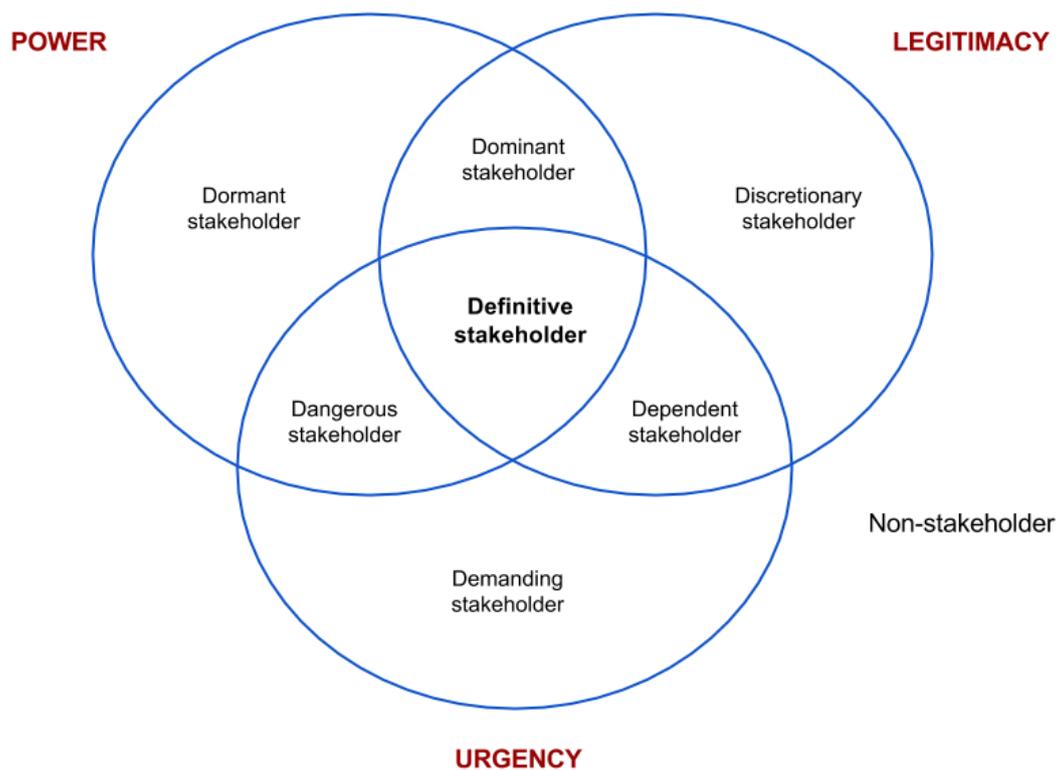


Figure A7. Mitchell et al. stakeholder model  
 Source: Mitchell, Agle and Wood (1997)

Of the models considered, this model appears more suited to explaining the stakeholder environment in relation to the NBN debate. Data demonstrated that more powerful stakeholders (AGD, the DoC, and the office of the Minister for Communications), even when they did not seek to engage in the public issues debate, were able to influence behind the scenes discussions with major telecommunications companies, and before Senate Inquiries.

These stakeholder models cannot be applied to the NBN policy issues under consideration in the abstract, as the dimensions will vary depending on the perspective of the organisation doing the analysis. For example, power relationships will differ, so a stakeholder will have varying levels of power and in some instances legitimacy from another individual stakeholder perspective.

Other theorists put forward varying stakeholder models, with Freeman and Reed (1983) considering:

- equity/ownership stakes (e.g. shareholders)
- economic/market stakes (e.g. employees, customers), and
- influencer (e.g. consumer advocates).

By comparison, Mitchell, Agle and Wood (1997) look at the following stakeholder attributes:

- power (exerted on organisation by stakeholder)
- legitimacy (legitimacy of claim laid on organisation by stakeholder), and
- urgency (degree to which the stakeholder calls for immediate action).

Where groups have emotional engagement in issues, this can increase or decrease the group's usefulness or potential to divert the public debate for an agency (Center & Jackson 1995). For the NBN debate, government agencies are able to give greater or lesser legitimacy to other groups in the debate by granting them access to meetings and discussions, and publicly reflecting their input (Carroll 1991).

Two areas of access that are of great importance to stakeholders in the NBN debate are access to the political process and the mass media (Nasi et al. 1997). Bridges' view includes the media among stakeholders – and this is the view among many practitioners who include the media in their target audiences in communications strategies (indicated by interview data).

Conversely, Mahoney (2013) views the media as a tertiary or intervening target public, which is a target public that may influence the primary and secondary target publics. Practitioners consequently see journalists as a way to feed stories to the media (Mahoney 2013), and this was borne out by interview data, including with iiNet, where they found that even apparently negative media interest could result in calls from journalists wanting further information. This was an opportunity to provide multiple positive stories in response.

In practice, research and interview data suggested it is better to treat media as a stakeholder group, due to the potential power they wield over the public agenda and the debate on an issue. Taking a purely theoretical approach, it is beneficial to view the media and journalists instead as a means of communicating the message. As some journalists, and bloggers are now akin to participants in the debate in their own right, they act increasingly as independent stakeholders in the discussion.

This study demonstrated that stakeholders are able to significantly contribute to the direction of the public debate (e.g. iiNet). A Nasi et al. (1997) study concluded that a corporation's approach to various issues 'was a response to the influence and power of specific stakeholder groups' (Bridges 2004, p. 56). Research and data in this study confirms this approach to understanding the role of stakeholders in IM.

Bridges' view is that 'an organization's interests are not generally in jeopardy until an emerging issue is associated with at least one organized or organizable group... and has attracted the interest of the mass media' (p. 56). She draws on van Leuven & Slater (1991), Renfro (1993) and Heath (1997) in coming to this conclusion.

This approach is limited because it does not account for the impact on internal stakeholder groups. If they are internal, then an issue could impact them before becoming associated with an external group. Arguably even at this early stage the organisation's interests could be in jeopardy. Furthermore, research shows that the issue can have devastating consequences for an organisation even without being recognised by the "mass media" or by external parties.

Boyd and Waymer note that 'for an organization or its particular policies to have legitimacy... its messages need to be consistent (or perhaps consistently ambiguous) among a variety of overlapping publics' (2011, p. 477), in the context of examining organisational rhetoric. Communications practice, and this is reflected in interview data (e.g. Dalby), shows that different messages are often required for specific stakeholders – although these should all be consistent.

Social media, and the potential for viral and potentially unpredictable issue development, can make it more challenging for organisations to map stakeholders and their relative power. This is because a seemingly less important stakeholder blogger, who may have no relationship with the organisation, could post a blog, including a fictitious link to a fabricated YouTube video, which could then develop into an issue for an organisation being targeted.

Grunig and Repper (1992) posit that PR managers 'should plan ongoing communication programs with the most important – the most strategic – stakeholders – working down the ranked list until the resources available for public relations are used' (p. 126).

The data for this study suggests that stakeholder power can vary rapidly. Relationships between stakeholders – with potentially greater discoverability, and the ease with which activist stakeholders can launch online campaigns and co-ordinate resources – can be fluid.

An activist social media campaign, involving viral content, could see a group that previously would have been perceived by an issue manager as less important, suddenly become important, and in a position to exert influence on an organisation. This has implications for the overall usefulness of traditional stakeholder models, and powerful stakeholder theory, in a fluid issue environment that includes online.

## APPENDIX 25 – Government cf. corporate IM

Findings demonstrated an unwillingness to agree that public affairs IM is even occurring in some government agencies, particularly where the function of IM is dispersed across levels of management, as reflected in some interviews where interviewees were adamant that there was no IM. This could support the view that some government agencies have moved the management of issues into a RM framework, with RM seemingly more publicly acceptable.

Government issue managers in the bureaucracy (e.g. DoC), particularly when they are involved in major policy initiatives, found themselves walking a fine line between advocacy on the one hand, and supporting and implementing government policy on the other: ‘That’s always a problem in senior jobs in the public service. In a sense your job is to defend and explain the government’s policies without advocating them’ (DoC, Quinlivan 2014, pers. comm., 18 June).

Data demonstrated that what is expected of organisations is subject to ongoing change as social trends and norms change, for example, with regard to the digital divide and access to the internet. The fact of a private sector organisation providing choice, whereas government does not – in that all citizens have to deal with the Australian Taxation Office (ATO), for example – whereas they may choose another bank – heightens the expectation that government will perform and conduct its affairs in the best interests of its stakeholders, to a high standard.

Government agencies are in a privileged position by comparison with corporations, so the DoC and the ACCC already have some legitimacy in the eyes of stakeholder publics and in the public sphere. This was reflected in interview data from meeting with the ACCC, and in the way interviewees described their regulatory role.

This contrasts with corporate entities that need to expend significant resources on achieving legitimacy, and in establishing a corporate reputation that conveys legitimacy. In the public sphere, the extent to which the organisation has legitimacy has been shown in this research to support or detract from its pronouncements on NBN policy.

nbn has been placed in a more challenging position, due to its partial public/private corporate status, and as indicated from interviews, and its arguable use a “political football” in policy debates about the NBN.

NGOs, and in particular, ACCAN and EFA, are able to derive some legitimacy from their NGO status. This status can also diminish legitimacy, because they can be perceived as not having a specific status in the debate that is not influenced by funding sources, which also restricts their ability to engage in the public sphere on NBN policy.

NGOs are only able to commit certain funds to each issue. For example, ACCAN, which was indicated by the data from interviews, makes decisions about which prominent

public sphere issues to commit resources to – creating unique challenges (Anon 10). Government agencies, when engaging in the public sphere, have to carefully position their communications so they are able to manage issues but still reflect messaging and IM imperatives from their political masters, and in the case of the DoC, from Minister Turnbull’s office.

It could be argued, in light of findings from this study, and on the basis of interviews with government issue managers, that the differences between corporate and government IM appear to be diminishing, as the findings show government issue managers adopt similar practices to those in commercial environments.

## APPENDIX 26 – IMC best practice indicators

(Source: Palese & Crane 2002c, IMC 2011)

### STRUCTURE

1. There is an established mechanism to identify current and future issues through environmental scanning / issues analysis.

#### Reference points

- Designated individuals formally monitor key sources such as news media, journals, research, websites, external conferences and peer industry activities.
- Organisation actively participates in trade associations including monitoring and lobbying of legislation, new regulations and relevant litigation at local, national and international levels.
- Phone or email hotlines allow employees to elevate issues with management (anonymity available).
- Community Advisory Panels or third party focus groups are actively promoted.
- An established process is in place to receive, evaluate and prioritise scanning inputs from both internal and external sources.

2. The organisation has adopted a formal process to assign and manage issues.

#### Reference points

- Established policies or procedures describe the IM process including roles and responsibilities documentation.
- Formal prioritisation tools optimise IM e.g. impact matrix, risk evaluation and prioritisation analysis.
- Issue strategy development tools or worksheets are consistently used.
- Issue status files and position statement are regularly updated.
- Information is maintained to facilitate future access to last status and lessons learned.

3. Responsibility for stewardship of the IM process is clearly assigned and mechanisms are in place to build organisational expertise in the discipline.

#### Reference points

- Job descriptions show clear responsibility for the IM process.
- An IM Centre of Expertise provides practical resources to improve IM awareness and effectiveness at all levels of the organisation.
- The IM process steward formally monitors issue teams to eliminate redundancy, promote consistency of policy and messages and optimise resource deployment.
- Formal training is available for IMTs to properly implement the process.
- Operational IM processes are regularly reviewed and benchmarked.

## IMPLEMENTATION

4. “Ownership” of each major issue is clearly assigned at an operational level with accountability and results linked to performance reviews.

### Reference points

- The issue owner is clearly identified on all documentation and communication.
- Action plans and timelines set out group and individual operational activity.
- Issue progress is assessed in evaluation against formalised operational or tactical goals.
- Personal and team issue achievements relate directly to salary and bonus assessment.
- Management authorise resources such as task teams to address particular issues.

5. Progress against key issues is formally reviewed with organisational “owners” on a regular basis and the status of each is monitored at the highest management level.

### Reference points

- Issue teams meet and report on a regular basis.
- Recognised processes exist to formally evaluate progress against strategic objectives.
- CEO is regularly briefed on key issues including status and plans (e.g. weekly or fortnightly).
- Established processes record and implement management feedback.
- Management formally review issue position statements and actively participate in regular status updates (e.g. quarterly).

6. The Executive Committee or Board of Directors has fiduciary oversight of IM; has mechanisms in place to report progress to Directors and/or external stakeholders; and has authority to intervene in the event of non-compliance or misalignment.

### Reference points

- Board level management have direct issue involvement (e.g. public policy or environmental affairs committee or nominated Director to lead or maintain the issue process and related policy).
- Issue reports are available to external stakeholders (e.g. annual report, CSR report).
- Organisation external website provides issue updates and a mechanism for stakeholder feedback.
- Established procedures exist for the Board of Directors to intervene where necessary and to penalise non-compliance.
- Board of Directors utilises an executive level external issue or stakeholder advisory board.

## INTEGRATION

7. Formal channels exist for managers at all levels to identify and elevate potential issues for possible integration into broader strategic planning, including external stakeholder management.

### Reference points

- Strategy planning specifically reviews current and future issues and their financial impact throughout the business lifecycle.
- External stakeholder advocates formally report findings and feedback.
- Business or new product reviews identify and address potential issues.
- Issue scans are formally identified and trained.
- Managers actively encourage outside-in perspectives and employee participation.

8. Management of current and future issues is well embedded within the strategic planning and implementation processes of organisational clients or owners.

### Reference points

- Training programs promote IM as a standard operating procedure.
- Leadership of the business or operating unit which owns the issue receive regular updates.
- Issue owners are members of core management.
- IM plans are fully aligned with business plans to ensure optimum synergy and minimise duplication or internal conflict.
- CEO briefing book integrates issues into the annual general meeting, analyst briefings and other stakeholder communication.

9. IM is recognised and organisationally positioned as a core management function which is not confined to a single function or department.

### Reference points

- IMT leadership and membership reflects diversity of function or department.
- IM is recognised in job descriptions across all key functions and departments.
- Individual issue managers and process owners participate in key management groups.
- Issue champions are appointed from senior management of impacted departments.
- Issue process training is scheduled and monitored for all levels of participation including employee orientation.

## APPENDIX 27 – Issue prioritisation model

The following diagram sets out a potential issue prioritisation model (Jaques 2014, p. 64).

Category	Description	Discussion	Maximum value (the higher the score, the greater the priority)
Impact	Potential magnitude for the organisation if the issue is left unmanaged	Impacts may include reputation (particularly with key stakeholders); financial (both profitability and share value); regulatory (including licence to operate, fines and penalties); and legal (current and potential litigation)	20
Salience/ legitimacy (sometimes called social consensus)	How widely in society the issue is regarded as a concern	Assesses not just the present situation, but also whether attention to the issue is likely to change substantially soon; it reflects what influential stakeholders and society regard as important, not the opinion of the organisation concerned	20
Visibility	Extent of coverage in the news media and social media	Considers both the nature and quantity of media attention: is the coverage confined to news reports, or does it include opinion pieces/columns/blog? Which media are active?	20
Affectability/ leverage	The organisation's capacity to influence the issue	How much influence could be achieved, setting aside for the moment questions about resources available—if it is important enough, resources can usually be found	20
Proximity/ timing	When the issue is likely to reach its maximum impact	Although issue management is about early intervention, potential timing of competing issues helps to decide the order in which they are addressed; the question of likely peak timing assumes no prior intervention	10
Profile	Willingness of the organisation to expose its brand or reputation	A core product or activity may warrant greater commitment than for a minor or peripheral activity; however, minor products can generate disproportionate reputational and financial damage	10

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