

From: [Sheet Music Boss](#)
To: [bargainingcode](#)
Subject: Our Concerns regarding the News Media Bargaining Code
Date: Wednesday, 26 August 2020 4:43:05 PM
Attachments: [39B5F1247A8E4DA99B135B08D977BDE9.png](#)

Dear ACCC,

I am writing to you to discuss the draft of the News Media Bargaining Code, as the vagueness of the presented wording is concerning to us.

I co-run Sheet Music Boss, a YouTube channel with 1.85 million subscribers that sees around 1 million daily views on its content. I run this channel together with my co-founder, Samuel Dickenson, a fellow Brisbane composer. We are the 67th most-viewed Australian-based YouTube channel.

Our channel is our livelihood; we depend on the ad revenue gained through our videos to pay our daily expenses, and we have concerns about the draft Code in both its current state and its entire premise.

While the draft Code mentions only Google Search, Google News, and Google Discover as default inclusions, we are concerned that the Code will eventually be amended to include YouTube.

We feel the Code is too vague about which other digital platforms "may be added to the code" (1.2). News is a significant inclusion on YouTube, so we expect YouTube to eventually be included in this Code.

If YouTube is eventually included as a platform, we expect we and other Australian content creators like us will see our prosperity on the platform decline. This would be as a result of YouTube paying news media companies money that might have otherwise been invested in independent creators like us. In addition, news content may be given artificial precedence over our content in the YouTube algorithm, meaning our content misses out on potential views through no fault of our own.

We do not feel it is fair for news companies to be given special treatment under the law. Why should additional money be paid to news media for their content on Google's platforms when no other type of creator is given such a privilege?

The News Media Bargaining Code purports to "address the bargaining power imbalance between Australian news media businesses and digital platforms", however the effect of the code will *create* a drastic power imbalance between such news media businesses and *all creators of all other types of content*. Why should the news media be given special privileges not afforded to any other kind of creator? For this reason, the entire premise of the code is flawed in our eyes.

We work very hard to produce content as independent creators and we feel that news corporations are demanding far more than their fair portion of revenue from the platform we share. If news corporations are able to demand significant sums of money from YouTube, we expect this would leave less for YouTube to invest into us and other independent Australian content creators.

We feel that news corporations ought to play by the same rules as the rest of us, not be given special treatment with disproportionate rewards for the same amount of views and

watch time as all other Australian creators. The onus should be on news media to adapt to the landscape, not the other way around.

As such, we do not agree with the premise of this draft Code.

Sincerely,
Andrew Wrangell and Samuel Dickenson
Sheet Music Boss Pty Ltd

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Andrew Wrangell and Samuel Dickenson

Directors | Sheet Music Boss Pty Ltd

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