NAB
National Association of Broadcasters

Independent Communications Authority of South Africa

350 Witch-Hazel Avenue,
Eco Park, Centurion.
Attention: Mr Davis Kgosimolao Moshweunyne
By email: DMoshweunyane@icasa.org.za

31 January 2020

Dear Mr Moshweunyane,

NOTICE ON THE LICENSING PROCESS FOR THE INTERNATIONAL MOBILE TELECOMMUNICATIONS SPECTRUM

1 The National Association of Broadcasters (NAB) is a leading representative of South Africa's broadcasting industry, representing the interests of all three tiers of broadcasters. Our members include the public broadcaster, commercial and community broadcasters, signal distributors, and a range of industry associate members.

2 The NAB has through its numerous submissions actively participated in the Authority's processes regarding spectrum management and administration to ensure compliance with international regulations as agreed to and adopted by South Africa.

3 On 1 November 2019 the Authority published a notice on the licensing process for International Mobile Telecommunications (IMT) Spectrum for

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The NAB is a voluntary industry association funded by its members

the provision of mobile broadband wireless open access services for urban and rural areas using the complimentary bands IMT700, IMT800, IMT2300, IMT2600 and IMT3500.

4 The NAB further understands that this process follows from the Ministerial Policy on High Demand Spectrum and Policy Direction on the Licensing of a Wireless Open Access Network published on 26 July 2019.

Digital migration process

5 The Authority acknowledges that the frequency bands 703-790 MHz and 790 – 862 MHz are still subject to the digital migration process. The NAB submits that whilst the switching off of analogue television transmission has begun, the completion of the migration process has been laboured with numerous challenges, in particular the unavailability of set-top boxes, the lack of consumer support structures and revisions to the broadcasting digital migration delivery model. These delays pose a significant risk to the protection of analogue services, particularly those of the SABC.

6 As licensed broadcasters, the members of the NAB are committed to the digital migration process and efficient use of spectrum. There have been ongoing engagements between NAB members and the Minister of Communications and Digital Technologies following the announcement of a new delivery model in her 2019 budget vote speech. The NAB is therefore encouraged to note that the Authority is to develop the radio frequency spectrum assignment plan for digital terrestrial television (DTT) in an effort to expedite the Analogue Switch Off (ASO) and we look forward to further engagements with the Authority in this regard.

7 The NAB is aware that studio (STL) radio links have to be moved as part of digital migration. However, this process is yet to be completed and

suitable spectrum for STLs is yet to be properly considered. The NAB submits that in determining the alternative bands for STL's, the Authority must also consider the cost implications of migrating STLs to bands where compatible STL units are not readily available.

8 Section 30(2)(b) of the Electronic Communications Act 36 of 2005, as amended, provides that in controlling, planning, administering, managing and assigning the use of the radio frequency spectrum, the Authority must take into account modes of transmission and efficient utilisation of the radio frequency spectrum, including allowing shared use of radio frequency spectrum when interference can be eliminated or reduced to acceptable levels as determined by ICASA.

9 The NAB therefore recommends that the digital divided spectrum should be brought to use only after ASO, and digital to digital migration has been completed. There is ICASA precedent for granting a license, but only issuing it at a later stage. This will mitigate against interreference and disruption of services in line with objects of the Electronic and Communications Act, 2005, as amended.

Digital sound broadcasting services

10 Currently there is no spare high-power FM spectrum available particularly in the major metropolitan areas and large cities. This scarcity has become a barrier to entry into the radio broadcasting industry for new entrants as evidenced through the moratorium on class licences which was recently lifted in July 2019. This scarcity has also hampered the coverage growth of existing broadcasters.

11 There is therefore a dire need for spectrum efficient technologies which will serve as an additional platform for sound broadcasting. Digital sound broadcasting (DSB) technologies offer a range of benefits including

efficient use of spectrum and energy, multiple channel capability, consistent quality of reception and advanced audio quality, as well as value added services, including dynamic label system and display of information. There has been extensive research and investment in preparation for the adoption and implementation of DSB technologies for the South African market. To this end, the broadcasting industry has been testing DAB+ through the trial license granted to the SABC, and DRM30 through Pulpit Media.

12 The roll out of DSB services is also largely dependent on full DTT migration which will free up spectrum. The NAB therefore recommends that there be sufficient provision of spectrum from the digital dividend to enable the availability of digital sound broadcasting services throughout all the major metropolitan cities.

13 In conclusion, the NAB thanks the Authority for the opportunity to make this submission and we look forward to continued information sharing and engagement.

Yours Sincerely

Nadia Bulbulia
Executive Director