



Blulemon Pty Ltd

Reg no. 2005/011512/07

61 Eden Park Edenglen Edenvale PO Box 1078 Edenvale 1610 Republic of South Africa
Telephone: Cell: 082 339 9305 *Email:* russel@blulemon.net www.blulemon.net

RE: DIGITAL SOUND BROADCASTING SERVICES REGULATIONS, 2020 28 DECEMBER 2020

ATT: MR. NDUMISO DANA

PROJECT MANAGER

ndana@icasa.co.za

012 568 3817

Dear Mr, Dana,

Thank you for the opportunity to submit written representation to ICASA.

Blulemon (PTY) Ltd, is a Signal distributor for ICASA since 2012 and holds various ECNS licenses in the following districts:

JOHANNESBURG METROPOLITAN DISTRICT

EKURHULENI DISTRICT

WEST RAND DISTRICT

CAPE TOWN METROPOLITAN DISTRICT

ETHEKWINI DISTRICT

WEST COAST DISTRICT

Blulemon supply signal distribution services to radio stations in this areas where ECNS licenses are issued. To name a few, like KOFIFI FM, HOT 919FM and DEEP SOUTH FM.

We supply to new applicants full technical study reports and frequency finding and map coverage reports to submit with the license applications, both Community and Low Power Commercial licenses to ICASA. At the current time we have more than 15 pending applications awaiting successful outcomes.

BluLemon has also participated on the WECODEC DRM+ trial (Africa's first DRM+ trial at all) as signal distributor and ENCS license holder as noted in the trial report. In other words, BluLemon is the only ECNS license holder on the continent that has practical experience with the DRM+ technology.

Having said this, BluLemon would comment on the Draft Service Regulations as follows:

Referring to paragraph 4, FRAMEWORK FOR DSB SERVICES, Blulemon is happy with the format to start with dual broadcasting of Analogue and Digital; but we feel also that there are so many new stations waiting so long to get a chance to broadcast and the waiting period of two years will make them again desponded. This is not only BluLemon's but also the opinion of numerous of my clients that have submitted new applications and awaiting outcome of their licenses so we would propose to remove this waiting period or at least shorten it to e.g. 6 months.

Another point is that many of my clients operate in the space of Low Power Commercial Broadcasting and very often also their applications are denied because of insufficient spectrum availability. Especially for those BluLemon believes that DSB might be a great chance to assist such applicants with the opportunity to utilize digital spectrum using DRM+. The background is that the majority of spectrum incompatibility for such stations is resulting from interference caused by strong FM stations with their proposed frequencies and not vice versa. But the new DRM+ receivers are using wide-band tuners with SDR (Software Defined Radio) decoders so for those receivers it does not matter if the separation to the next strong FM signal is 200 or 500kHz. On the other hand, the propagation of low power stations is so minimal that their interference with other stations usually is not the limiting factor and with a tiny DRM signal (96kHz sharp) even this effect becomes much less relevant.

BluLemon therefore proposes to add a paragraph that applicants for low power commercial licenses may without limitations (or even waiting period) also chose DSB technologies when applying for their 1W FM frequencies.

BluLemon further wishes to be part of the "REPRESENTITIVES FROM LICENSED ECS/SIGNAL DISTRIBUTORS OPERATORS" as in paragraph 4.4.(5).

In terms of section 4D of the Independent Communications Authority of South Africa Act No. 13 of 2000 (ICASA Act), Blulemon has no objections regarding confidential information.

Yours sincerely

Russel Jones

Managing Director