



DIGITAL radio mondiale

Digital Radio for All

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By Email: ndana@icasa.org.za

Mr Ndumiso Dana,
Block A, Pinmill Farm,
164 Katherine Street,
Sandton,
Republic of South Africa

Digital Sound Broadcasting Services Regulations, 2020 Consultation

Dear Mr Dana,

The Digital Radio Mondiale Consortium would like to congratulate ICASA for setting out the framework for the introduction of DSB services and the envisaged procedure for applicants seeking to provide DSB services. We consider the ICASA November 2020 DSB Regulations draft a huge step forward on the way of digital radio implementation which should provide extensive DSB services and benefits to all the citizens in the country.

If we may we would like to make just a few comments:

1. As the Regulations are referring to the terms "DRM30" and "DRM+" (the DRM Consortium is meanwhile referring to "DRM in the AM Bands" and "DRM in the FM Bands") we believe it would be helpful to add the mentioned extra explanation of the DRM digital broadcast standard and its two modes under "1. Definitions" (or add the details to section 6) where it should read:

DRM+ DRM in the FM-Bands (VHF Bands I, II and III)
DRM30 DRM in the AM-Bands (Long, Medium and Shortwave)"

2. "Mux" is defined in the document "as a network of frequencies designed to simultaneously permit the transmission of two or more channels". In general, the term is often used to define a signal provided by a third-party enabler or platform operating services of typical multi-channel standards or systems. On the other hand, DRM is designed as the successor of analogue AM/FM and thus allows the practical control and provision of services for a single broadcaster (even if technically a mini mux of up to 3 audio programmes can operate). Consequently, there should also be an option

not only for existing self-providing broadcasters (5.4) but also for new applicants for applying

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DRM Project Office, 610 Chiswick High Road, London, W4 5RU, UK
Registered office: PO Box 360, CH-1218 Grand Saconnex/Geneva Switzerland



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for a DRM spectrum license to self-provide their services.

3. In this light it should also be considered to allow signal distributors (ECNS license holders) who desire to operate a small DRM Mux (typically limited to max. 3 audio services) to apply for a spectrum license outside an ITA process. During the transition period from analogue to digital sound broadcasting the FM Band will be a welcoming dynamic space to accommodate both analogue and digital broadcast signals and allow for flexible channel allocations – this flexibility would unnecessarily be limited, if it were bound to ITA processes, exclusively.
4. Point 3 stipulates that applicants without existing sound broadcasting licenses will be considered two years after the effective date of these Regulations. We believe that this period is way too long considering the continuous existing moratorium on community radio licensing that was originally imposed due to the lack of radio frequency spectrum, specifically in the FM band. Now, with the immediate access to additional DRM spectrum, this problem can be considered being solved and maintaining, therefore, an additional artificial delay is not productive at all.

In any case, there will have been already a waiting period, without this extra delay, as these regulations still need to be finalised and gazetted. It might be that, perhaps, the spectrum plan will have to be amended. Besides, the licensing process also takes time until eventually a license is issued. And, as ICASA has the right to decide when to issue which license to whom, this in-built delay would only limit its activity without any obvious benefit.

5. We welcome the intention of setting up the DSB technical advisory group, DTAG. We are offering to contribute and support your activity in this body both as an international not-for-profit Consortium dedicated to the take-up of this standard across the world and through our local representatives. The excellent DRM international and South African expertise can help objectively and fully with the development of the terms of reference and creation of the framework for a smooth transition to DSB in South Africa.

Yours sincerely

RUXANDRA OBREJA
Consortium Chairman
Digital Radio Mondiale (DRM)

Email: projectoffice@drm.org

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