

Mr. Ndumiso Dana, Project Manager
Independent Communications Authority of South Africa
By e-mail: ndana@icasa.org.za

28 December 2020

Dear Mr. Dana

DRAFT DIGITAL SOUND BROADCASTING REGULATIONS, 2020.

Submission of representations in response to NOTICE 639 of 2020 in Government Gazette 43900.

TWR welcomes the opportunity to submit our representations on the draft Digital Sound Broadcasting Regulations, published on 13 November 2020.

TWR is a global broadcaster of more than 60 years standing. We own and operate high-power long-range broadcasting facilities on four continents, including two transmitting stations in Africa, broadcasting on Shortwave and Medium Wave. TWR also operates FM stations in several countries. We also broadcast using DRM technology in Asia.

Our representations consist of two main points:

1. **Clause 4 (3)** proposes that the authority will consider applicants without existing sound broadcasting licences two years after the effective date of the regulations.

Given the impetus and levels of investment required to start digital broadcasting services such as DRM and the considerable further investment needed to encourage the sustainability of such services, for instance to provide by one means or another for receiving sets, TWR considers that applicants with credible track record and business plans for such services should not be required to wait for two years after the effective date of the regulations but should be included in the first Invitations to Apply issued by the Authority. TWR believes that if we and others are to wait for two years before an application can be made, there will be a considerable further delay in bringing services such as DRM to sustainability.

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2. Questions regarding the **DRM30 HF band (Shortwave)**:

2.1 Will the DRM30 HF band (Shortwave) fall within the scope of the regulations?

2.2 And if so, what will be the procedure for coordinating this with HFCC?

As a global broadcaster we work closely with the HFCC and will be prepared to liaise and assist in this regard if required.

In conclusion I thank you for the opportunity to make these representations on behalf of TWR.

TWR is available to attend any oral hearings to present these representations.

Yours sincerely



Simon Burdett
International Director for East and Southern Africa



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