

SASFED's Oral Submission to ICASA

Draft DTT Regulations

September 2025



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The South African Screen Federation
www.sasfed.org

SOUTH AFRICAN SCREEN FEDERATION



SASFED's VALUE

LOBBYING
ADVOCACY

Legislation, Policy and
Regulations for sector growth
and development



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CONTEXT AND IMPERATIVE FOR CHANGE

Digital migration is a once-in-a-generation restructuring of TV access

Risk: audience loss, consolidation, and exclusion without guardrails

- Opportunity: more SA stories, more jobs, fairer access for new entrants
- Regulations must tie capacity & licensing to measurable public outcomes

CORE PRINCIPLES

- Universal access and inclusion (audiences first)
- Public broadcaster stability (SABC as linchpin)
- Growth of independent producers & SMEs
- Fair competition in multiplexing & signal distribution
- Transparency, accountability, and data-driven oversight

ANALOGUE SWITCH-OFF: Preconditions



- $\geq 85\%$ household migration (DTT and/or DTH) verified by independent audit
- Device availability and installation capacity proven per province
- Minimum 6 months dual illumination per province post-threshold
- Monthly public migration dashboard (by province and reception path)

TRANSITION MANAGEMENT



Independent Audits

STB deployment,
household
migration,
digital literacy



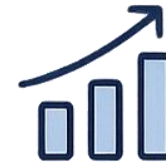
Contingency Plans

and support for
vulnerable
audiences



Transitional Funding

Assistance for
at-risk
independent
businesses



Regulatory Flexibility

to address real
world data
and gaps



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MULTIPLEX ALLOCATION AND MARKET STRUCTURE

Redress, diversity, dynamic use



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REBALANCE MULTIPLEX ALLOCATIONS



Greater Share for Public

Guarantee a greater minimum share for community & public-interest services



Transparent Reallocation

Transparent reallocation cycles with public criteria & audits



Shorter Window

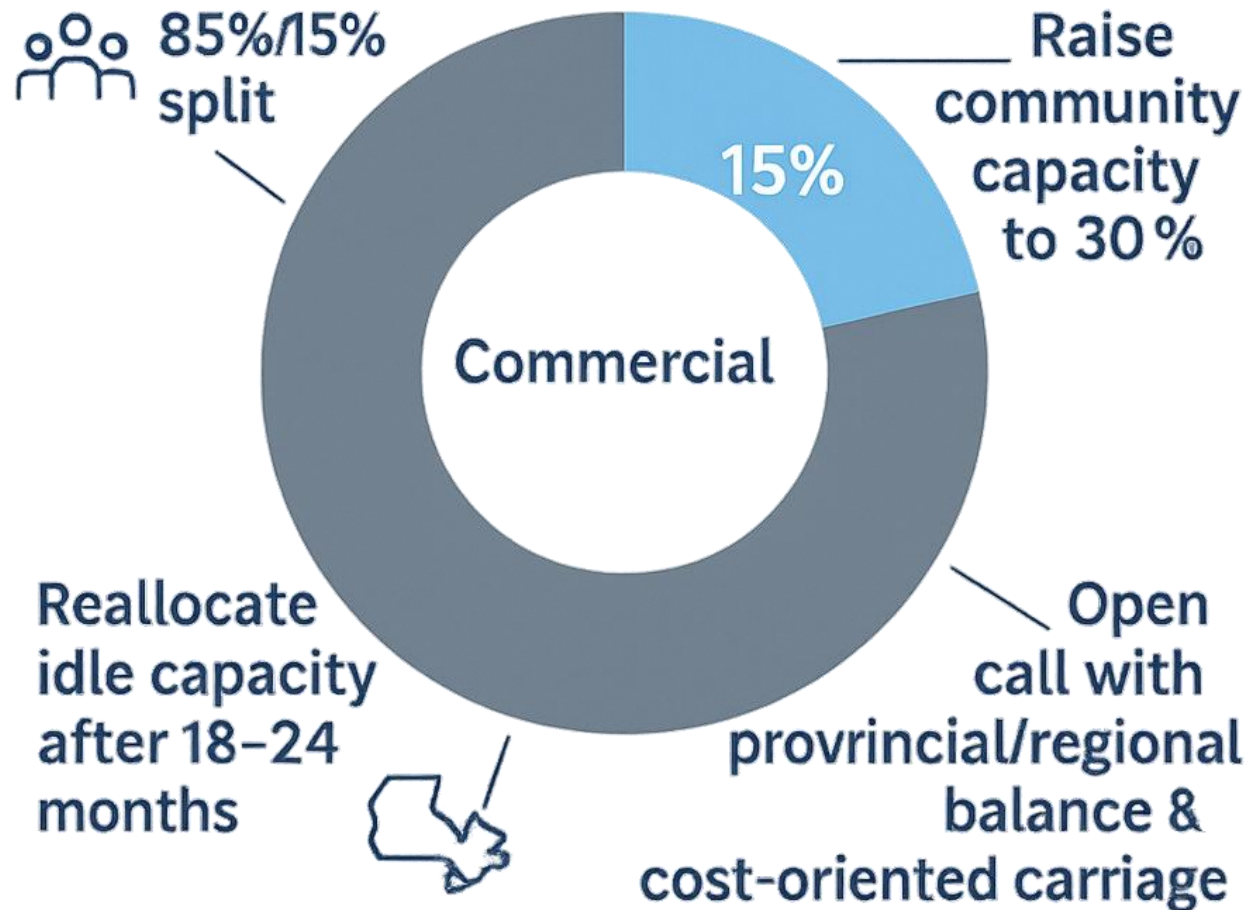
‘Use-it-or-lose-it’ window reduced to 18–24 months



Innovation Testbeds

MUX 6-7: active innovation testbeds with annual reporting

COMMUNITY TV CAPACITY (MUX 2)



Multiplex Operator — Legal Basis & Open Access



Clarify
statutory
basis for
any DTT multiplex
operator licence



Ensure
multiple
operators
and/or mandatory
open access
(FRAND)



Set
transitional
arrangements
for any incumbent
capacity holders

Avoid
bottlenecks;
preserve
competition
and
newcomer
access

CHANNEL AUTHORISATION

*Openness, audit, and
growth of independent content*



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Growth Levers

- Independent quota



- Independent quota
- Producer work dashboards

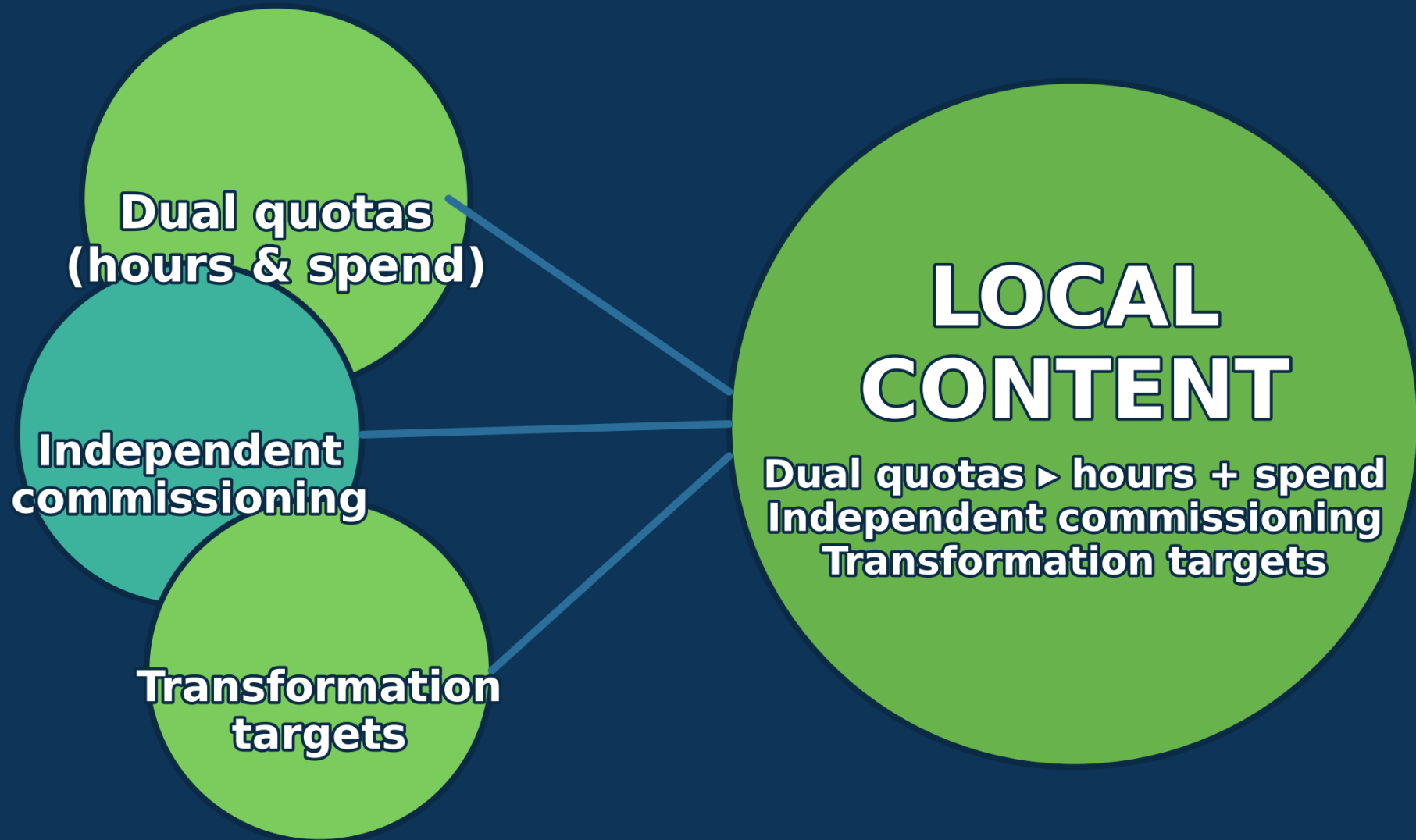
Development & Transparency

- Development fund

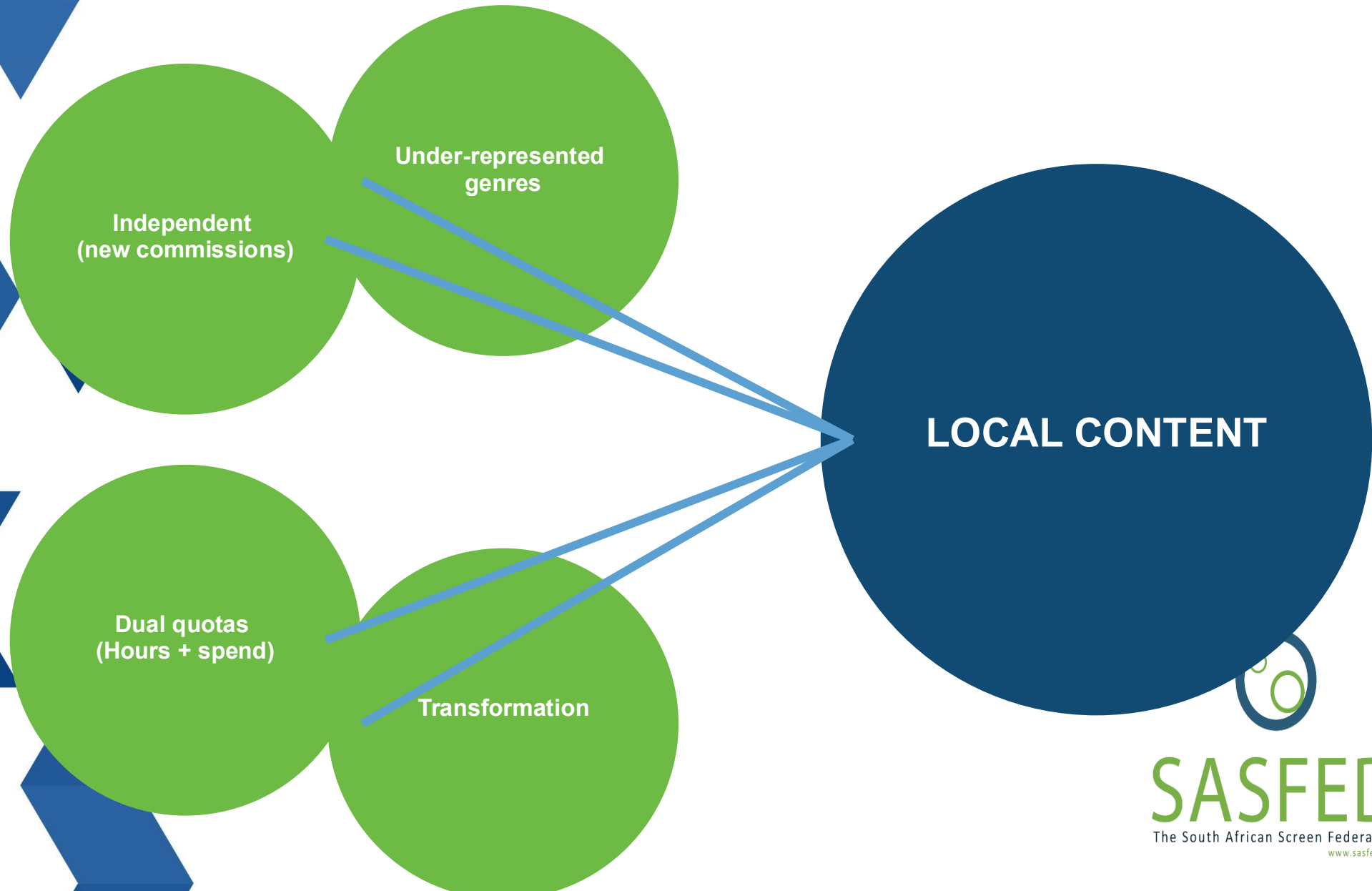
Independent Content

- Terms-of-trade
- Timely payment

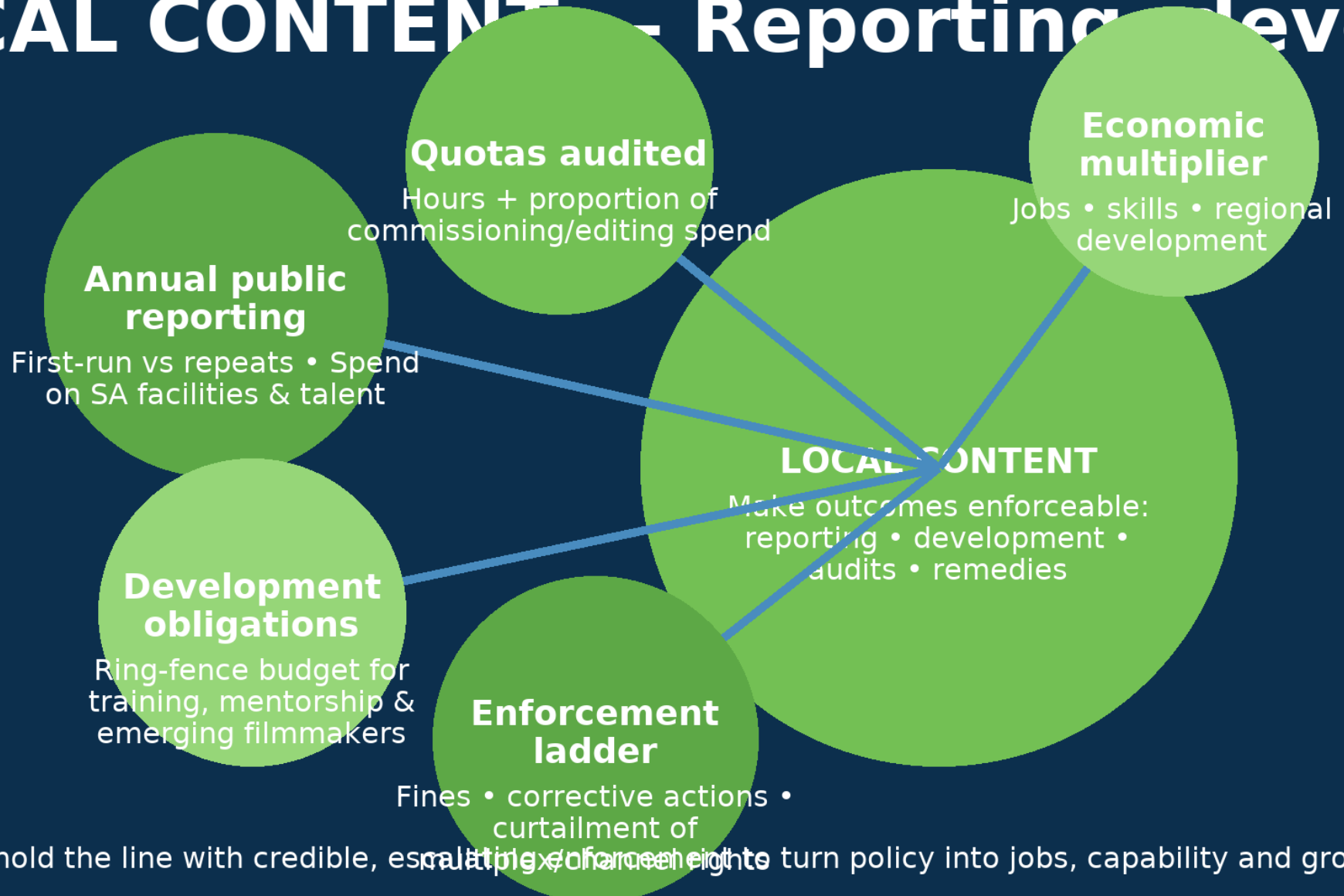
LOCAL CONTENT AND DEVELOPMENT: from quotas to an economic multiplier



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LOCAL CONTENT – Reporting & Development



ICASA must hold the line with credible, enforceable enforcement to turn policy into jobs, capability and growth.

EPG	20:00	20:30	21:00
SABC 1 1	▶ News 20:00 - 21:00		Drama
SABC 2 2	Movie		
SABC 3 3	Talk Show	Tot' Show	
e.tv	Documentary	Soapie	
SuperSport	Sport		
M-Net	Reality		



EPG/UI-CONCRETE INSTRUMENTS

- LCN: SABC 1–10; public-interest 11–20; regional/language 21–30
- Adjacency & clustering for SA channels and variants
- Default UI placement above commercial promos
- Search/voice priority for SA channels & titles
- On-platform promo inventory per SA original
- Annual EPG/UI compliance certification (LCN maps/screens)

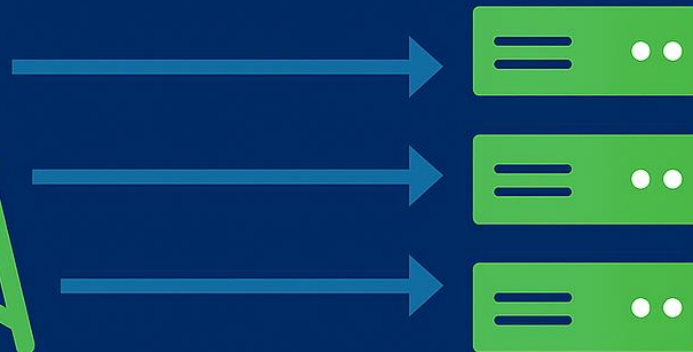
ACCESSIBILITY OBLIGATIONS (CC/AD) RISING QUOTAS

- Year 1: $\geq 50\%$ CC; $\geq 10\%$ AD (first-run)
- Year 3: $\geq 80\%$ CC; $\geq 25\%$ AD (first-run)
- Year 5: 100% CC; $\geq 40\%$ AD (first-run)
- Annual accessibility plan & reporting to ICASA

SIGNAL DISTRIBUTION



Reining in costs
& opening
competition



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Signal Distribution

Reining in costs & opening competition

FAIR PRICES AND COMPETITION

- Open signal distribution to multiple ECNS licensees (fair, non-discriminatory)
- Tariff regulation & transparency; full subsidy pass-through to tariffs
- Publish agreements/tariffs; independent compliance audits
- Summary recourse for exclusionary/anti-competitive conduct

OTT/Streaming Harmonisation

Level playing field across platforms



PATHFINDER ASKS (POST –ASO POLICY)

- Inquiry into discoverability & minimums for OTT catalogues/spend
- Prominence rules for SA/independent content on major OTT platforms
- Explore levy/investment contributions to fund SA independent production
- Ensure accessibility, language diversity & fair terms for SMEs on platforms

ECONOMIC IMPACT AND RISKS OF INACTION

- Lower entry barriers → more channels → more commissions
- Local content quotas on hours & spend → guaranteed market for SA producers
- Audience thresholds prevent shocks that collapse ad markets & commissioning
- Failing to act entrenches incumbency, erodes diversity, and risks jobs

SASFED'S REQUESTS TO ICASA



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SASFED'S REQUESTS TO ICASA

- **Tie analogue switch-off to real migration readiness**

- Commencement only when $\geq 85\%$ of households have migrated (DTT/DTH), verified by independent audit.
- Minimum six months of dual illumination per province post-threshold.
- Device availability and installation capacity demonstrated per province.
- Public monthly migration dashboards.

- **Rebalance multiplex allocations**

- Increase community TV's share of MUX 2 to $\geq 30\%$.
- Ensure redress, diversity, and dynamic use across multiplexes.

- **Codify channel authorization terms**

- Require transparent application content and terms-of-trade levers.
- Open, auditable processes that promote independent content growth.

- **Guarantee visibility and accessibility of local content**

- Adopt EPG/UI prominence rules (SABC 1–10, public-interest 11–20, regional/language 21–30).
- Default placement above commercial promos; clustering of SA channels.
- Search/voice priority and promo inventory for SA originals.
- Rising accessibility obligations:
 - Year 1: $\geq 50\%$ CC, $\geq 10\%$ AD (first-run)
 - Year 3: $\geq 80\%$ CC, $\geq 25\%$ AD
 - Year 5: 100% CC, $\geq 40\%$ AD
- Annual accessibility plan and compliance reporting.

- **Ensure fair prices and competition in signal distribution**

- Open distribution to multiple ECNS licensees on fair, non-discriminatory terms.
- Regulate tariffs, mandate transparency, and ensure subsidy pass-through.
- Independent compliance audits and remedies for exclusionary conduct.

- **Level the playing field for OTT/streaming platforms**

- Inquiry into discoverability and minimum local content obligations.
- Prominence rules for SA/independent titles on major platforms.
- Explore levy or investment contributions to fund independent production.
- Guarantee accessibility, language diversity, and fair SME participation.

CLOSING

- Regulations should deliver visible public value & measurable industry growth
- Independent sector is ready to partner on practical implementation
- We welcome questions and are available for further technical engagement

AND THAT'S
A WRAP!



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