



SUBMISSION ON ICASA'S DRAFT DIGITAL TERRESTRIAL TELEVISION REGULATIONS 2025

29 September 2025

By Uyanda Siyotula

Policy Principles



- Equitable allocation of Mux capacity, with preference given to the needs of public and community broadcasting services.
- Protection and viability of PBS and preference to broadcasters providing public interest content.
- Ensuring fair competition in the broadcasting sector and provide for a diverse range of public, commercial and community broadcasting services.
- Universal access to broadcasting services by all citizens irrespective of geographical location.
- Diversity of ownership and of content.
- Competition between signal distributors, or ECNS licensees.
- Effective stakeholder consultation and public participation.



The Fate of Local Content

- The Regs do not sufficiently focus on the importance of
 - public interest content,
 - audience needs,
 - protection of the public's right to universal access to a range of broadcasting services.
- We thus propose that the objectives of the Regs include a clause highlighting the need to provide a framework to ensure audience needs and expectations are met through ensuring universal access to choice, quality programming, across all three tiers.
- The Regs do not provide clarity regarding the application of the Local Television Content Regulations.
- Specifically, whether these still apply to existing licensees providing existing or new channels on the DTT platform.



The Fate of Local Content

- SOS urges ICASA to ensure that these regulations will continue to apply
- Where necessary they can be reviewed to promote the gradual increase of more original South African television content across all digital platforms, in particular, DTT and DTH .
- This is not a call for ICASA to be overly prescriptive in defining the content to be provided by public, commercial and community broadcasters.
- Rather to prescribe enabling regulations that promote the growth of the sector and the flourishing of compelling local original content in a variety of genres, for all ages and in all twelve South African languages.

Urgent Audit of the DTT Roll-out



- We re-iterate our call to ICASA to undertake a thorough audit of the status of the rollout of DTT.
- Specifically the extent of the impact on licensees required to migrate.
- The implementation of the Regs would be a futile exercise if licensees were unable to fulfil their licence obligations and comply with the regs if the technical and commercial viability of the DTT platform is in doubt.
- Audience adoption of the new technology is the key critical success factor of digital migration.
- This is recognised in the Broadcasting Digital Migration Policy which states that a core objective of the policy is to “create an environment for the uptake of digital terrestrial television by TV households, including the poor”.
- We urge ICASA to heed our call to urgently and carefully review any information available to determine how many households will be affected by the ASO and critically, the reasons why those who have not migrated or registered have opted to do so.

Urgent Audit of the DTT Roll-out



- SOS has conducted a few workshops in Alexandra and Sebokeng townships in which we became alive to on-the-ground challenges regarding the installation of the STBs.
- Some of the challenges include community members who
 - registered but have not received their STBs despite the system reflecting their status as 'installed',
 - Have malfunctioning STBs,
 - One received a call from the installers and confirmed her availability but installers never came, however, her status is recorded as 'returned'.
- It is not clear how community member with such challenges can be assisted, as the focus currently seems to be on new installations.
- We are not aware of a quality control or monitoring mechanism by the DCDDT.
- The insufficient rollout of STBs and the non-availability of STBs in retail outlets raises doubts about the viability of the DTT.
- It is not just the future of DTT that is at risk but the availability of free-to-air television.

SOS Call to ICASA



- SOS reiterates our call and expects ICASA to:
 - Represent the public interest in ensuring universal service to television content during the digital migration process.
 - Consider the migration to DTT as an abject failure if millions of South Africans will no longer have access to television.
 - To set numerical targets regarding the reasonable number (in percentages) of South Africans who must have migrated to digital TV (DTH, and DTT) before the final ASO takes place – in our view a minimum of 85% of the population must have digitally migrated.
 - To ensure that the Minister cannot press ahead if this will result in millions of citizens losing access to television.
 - Constantly remember that in the spirit of s192 of the Constitution the regulator acts in the public interest
 - SOS urges ICASA not to adopt too narrow a focus on DTT and to consider making policy proposals to the Minister of DCDT to amend the Digital Migration policy to recognize DTH as a viable alternative to DTT.



Purpose of the Regulations

- The Regs are narrowly focused on the application for spectrum/multiplex capacity and leave the matter of content on the channels entirely at the discretion of licensees.
- In line with the policy principles outlined above, i.e “preference to broadcasters providing public interest content” and “with preference given to the needs of public and community broadcasting services” and “ensuring fair competition...”
- We urges ICASA to consider whether a 15% allocation for all the community broadcasters in the country makes sufficient provision for the growth and development of that sector.
- At present there are more than five community TV broadcasters and even if they all elect to broadcast in Standard Definition (SD), they should not be constrained from providing their services in HD and from adding channels as and when their resources allow.
- It is imperative that community television broadcasters are not restrained from competing effectively on the DTT platform.



Framework for DTT

- SOS supports broadcasting in HD but allowing for community television broadcasters to continue to provide SD channels, without hampering their ability to provide HD due to limited multiplex capacity.
- SOS also supports the use it or lose it principle
- However, 36 months is too long, and perhaps 18-24 months is a more reasonable time to allow licenses to hold onto Mux capacity without using it.
- This approach would optimise the use of the Mux
- It would enable a shorter turnaround time for citizens to gain access to diverse channels and content in reality and not only on paper.

Multiplex Allocation



- SOS is delighted that ICASA allocated two full Muxes to the SABC given the scope of their public service remit.
- We trust and believe that the SABC will make use of this capacity to deliver local public interest content of the highest calibre and in all twelve of South Africa's official languages.

Multiplex Allocation



- SOS is not aware of the status of Kwesé, given that they were granted a licence some time ago and haven't commenced broadcasting
- SOS also has not seen any gazette published by the ICASA granting them permission to extend their launch date on good cause shown, as is a standard licence term and condition with all individual broadcasting services licensees.
- SOS requests ICASA to please provide clarity on this matter.

Multiplex Allocation



- With respect to Muxes 6 and 7 SOS is in support of making capacity available for test trials and research and innovation to promote the development of digital broadcasting.
- However, we urge ICASA not to allow this capacity to lie fallow while there is genuine demand for capacity (i.e community TV broadcasters).

Signal Distribution of DTT



- In line with the policy principle of Competition between signal distributors, or ECNS licensees, and ICASA's recent review of the Signal Distribution market
- SOS would like to see the licensing of a number of competing providers, giving licensees choice of signal distribution providers who compete on price and service offerings to the ultimate benefit of the broadcasters as consumers.
- SOS was rather surprised to see a reference to mobile television, given that this technology never launched in South Africa and indeed ICASA reassigned the frequencies to DTT.
- We kindly request ICASA provide further clarity (even by means of Explanatory Memorandum).



THANK YOU