



The Independent Communications Authority of South Africa
Pinmill Farm Block A
164 Katherine Street
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Attention:

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1. INTRODUCTION AND BACKGROUND

- 1.1 Classic FM 102.7 is a Johannesburg based commercial sound broadcaster licensed to provide a classical music radio format to Johannesburg and environs on 102.7MHz on FM.
- 1.2 On the 4th February 2013, the Independent Communications Authority of South Africa (ICASA), published in a government gazette number 36129, a notice inviting interested parties to provide written comments on the draft update of the Terrestrial Broadcasting Frequency Plan 2013. The closing date for written comments is the 18th March 2013. Classic FM 102.7 welcomes the opportunity to make its submission.

2 GENERAL COMMENTS

- 2.1 Classic FM supports the notion of regularly updating the Terrestrial Broadcasting Plan as it is in-keeping with the objects of the Electronic Communications Act 36 of 2005, by ensuring the most efficient use of the scarce radio frequency spectrum.
- 2.2 Our submission will focus on 3 areas.
 - 1).Data accuracy of the plan
 - 2) The allocation of spectrum for Studio to Transmitter links (STLs)
 - 3) Digital Radio

3 DATA ACCURACY OF THE PLAN

- 3.1 Of major importance is the fact that the plan serves as an information document to the broadcast industry and it is for this reason that the plan should be comprehensive and very accurate. The correctness of the plan is extremely important to every broadcaster



3.2 Classic FM has studied the document and while it doesn't have access to frequency planning databases, it has been able to spot numerous errors in the plan and wishes to point these out.

3.3 These are listed in the table below. While most refer to errors in the program names of various radio stations that have not been updated there are some that refer to community radio stations that are licensed by the Authority and are on air but their frequency allocation shows that they are still spare frequencies. This could be very detrimental to a prospective community broadcaster wishing to apply for a community sound broadcasting licence in a particular area and an embarrassment to the Authority.

3.4 Classic FM confirms that the entry for Classic FM 102.7 as it appears in the draft frequency plan 2013 is correct.

4 Table of erroneous entries in the VHF/FM frequency assignments

No	Station Name	Frequency	Program as per draft	Corrections to Draft
61	BISHO	100.3	CISKEI	TRU FM
246	DURBAN NORTH	100.1	P4DBN	IGAGAZI FM
261	EAST LONDON	104.1	CISKEI	TRU FM
316	FISHHOEK	100.0	P4CT	HEART FM
378	GRABOUW	107.8	P4CT	HEART FM
379	GRAHAMSTOWN	89.7	Shown as SPA CTY	Rhodes Music Radio
383	GRAHAMSTOWN	99.0	Shown as SP CTY	Kowie FM 99.0
430	HELDERKRUIN	93.9	Shown as SP CTY	Freq Unusable due to serious interference Midrand on 93.8
470	HOUTBAY	107.0	P4CT	HEART FM
535	KING WILLIAMS TOWN	89.9	CISKEI	TRU FM
852	PAARL	102.7	P4CT	HEART FM
907	PIETERMARITZBURG	98.5	P4DBN	IGAGAZI FM
1025	QUEENSTOWN	93.7	Shown as SP CTY	LUKHANJI FM 93.7
1027	QUEENSTOWN	97.8	CISKEI	TRU FM
1134	STELLENBOSCH	103.6	P4CT	HEART FM
1231	TYGERBERG	104.9	P4CT	HEART FM

4.1 Community sound broadcasting stations on air but the plan shows that they are spare community frequencies.



4.2 Two Community frequencies listed as spare community frequencies under the station name Grahamstown are in fact on air. Rhodes Music Radio on 89.7 and KowieFM 99.0 broadcasting to the Ndlambe Municipal area (Port Alfred) fall under the Grahamstown frequency grid.

4.3 Lukhanji FM 93.7 in Queenstown is broadcasting on 93.7MHz while it is shown as a spare community frequency.

4.4 93.9MHz is shown as a spare community frequency at station Helderkruijn when this particular frequency has been made unusable by the allocation of 93.8MHz to Midrand Community Radio (MIXFM). This should be removed from the grid.

5 ALLOCATION OF SPECTRUM FOR STUDIO TO TRANSMITTER LINKS (STLs)

5.1 STLs in the sound broadcasting industry have not been regulated to date. Broadcasters who utilise the services of Sentech to provide their signal distribution have generally been giving STL facilities in a previously unused band 5 UHF TV channel. While this has provided STL facilities to most commercial sound broadcasters in the metropolitan areas, this spectrum now falls within spectrum identified for digital dividend 1 and these STLs will need to be migrated outside of this band in due course. There are community broadcasters that do their own signal distribution through an ECNS licence using spectrum in the 400 MHz to 420 MHz part of the band using standard low power analogue FM transmitters with frequency up converters to this part of the band. This is a cost effective method of STL provision and in many cases these broadcasters do not have line of sight from their studios to their transmitter facilities and would be seriously disadvantaged if spectrum above 1GHz were to be allocated. Some have facility rental agreements with mobile operators to use mast infrastructure and are prohibited by these operators using anything above 600MHz. Spectrum has to be allocated for STLs to radio broadcasters but cognisance should be taken into consideration of the costs involved for broadcasters to change equipment to operate in the spectrum allocated.

6 DIGITAL RADIO

6.1 Classic FM applauds the fact that the plan seeks to make allocations for Digital Audio Broadcasting (DAB). DAB was adopted as a South African standard by the SABS on the 13th December 2005 ref SANS 300401. DAB+ is not a new standard but a technological advancement to the original DAB audio codec thereby making it a more efficient standard.



- 6.2 We note that the Authority does not foresee the setting of a switch –off date for analogue FM transmissions but sees digital radio as an additional service. While we support this stance it may be prudent to monitor international trends, that show that certain countries such as Norway, Denmark that have implemented DAB+ digital radio rollout, have taken policy decisions to switch off analogue FM transmission in due course. In the UK trials are currently underway to test the effect of a potential FM switch off on a selected community. DAB+ has been successfully rolled out in many parts of the world with prime examples being Australia and Germany. While the UK originally adopted DAB and has had the most successful rollout of the Eureka 147 DAB technology, limitations of the existing DAB system has meant that some music stations have opted to have mono national signals just to be on the mux. Clearly the introduction of DAB+ in the UK is not too far away. DAB+ trials are currently being held in the UK.
- 6.3 Current available VHF Band III spectrum is a limitation to the successful rollout of a DAB+ network in South Africa at present. This is due to the band being occupied by analogue TV transmissions. These are due to be migrated after 2015 and spectrum should become available for DAB+. The Draft frequency plan shows a table of Band III VHF allotments for DAB with two frequency multiplexes allocated to each province. Classic FM believes that the allocation of two multiplexes to some provinces might not be efficient planning as for example 2 multiplexes allocated to the Northern Cape may be underutilised due to its socio economic make up and the Authority should consider assigning more spectrum to the metropolitan areas where it is needed most. No mention is made of the possible introduction of TDMB services which would utilise large chunks of DAB spectrum for mobile television / video interactive services and would place a serious constraint on the proposed available DAB spectrum for DAB+ radio services. Classic FM believes not enough spectrum has been allocated to DAB and requests that the Authority reassign more spectrum to DAB to cater for the introduction of DAB+ radio services as well as any proposed TDMB services.
- 6.4 It is noted from the table of allotted frequencies for DAB that there are adjacent provinces namely the Eastern Cape and the Free State that have the same allotted frequencies. Should the proposed programming of these provincial multiplexes not be the same nor in synchronisation in the overlapping coverage areas, serious interference will occur making the transmissions in these areas unusable.
- 6.5 While provision has been made for DAB in the plan, no mention has been made for the possible introduction of DRM30 to digitise the Medium Wave band and make that spectrum more efficient. Broadcasters currently using Medium Wave have shown interest in introducing DRM 30 to South Africa.



7 CONCLUSION

ClassicFM 102.7 thanks ICASA for the opportunity to make a written submission. We are available to provide clarity should it be needed.

DDM Cherry
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CLASSICFM 102.7