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THE DISCUSSION DOCUMENT ON: DIGITAL SOUND BROADCASTING

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1. Introduction

1.1 We refer to Notice Number 161 of 2018, published in Government Gazette No. 41534 dated 29 March 2018 in terms of ICASA's Discussion Document on Digital Sound Broadcasting Service ("the Notice").

1.2 Kagiso Media (Pty) Ltd ("Kagiso Media") is a proudly South African, black-controlled media group of companies which has a number of commercial broadcasting interests and is therefore well placed to comment on issues of concern regarding the contents of the Notice.

1.3 Notwithstanding the fact that the Notice is long-overdue, Kagiso Media welcomes the much-needed intervention by the Authority to accelerate the migration of South African broadcasting from analogue to digital. Broadcasters across all spheres of broadcasting i.e. public service, community and commercial broadcasters have all embraced the advent of digital broadcasting ensuring that the South African media industry is ready for the fourth industrial revolution.

2. Overview of radio broadcasting and recent trends in South Africa

2.1 It is a well-known fact that broadcasting plays an important role in disseminating information, entertaining and educating citizens of a country. Therefore, an independent media forms an important cornerstone of any modern democracy. Given South Africa's history of racial discrimination, section 92 of the Constitution provides for the independent regulation of broadcasting in the public interest and to ensure fairness and a diversity of views that broadly represent the South African society.

2.2 Radio broadcasting has grown exponentially from 34 radio stations before 1994 to about 300 currently. According to the PriceWaterhouseCoopers[1], radio remains an important medium, reaching over 90% of people across rural and urban areas, aged 15 years and older in a typical week, with the number of households with radios currently exceeding 10 million in South Africa.

[1] https://www.pwc.co.za/en/assets/pdf/enm-20120-chapter5.pdf

2.3 The contribution by broadcasters in narrowing the digital divide in South Africa cannot be overstated. According to the Broadcasting Research Council ("BRC"), Radio has a reach of 98% of the population of South Africa, which is about 54 million people. It is therefore, evident that Radio is the most preferred choice of media. Overall the data indicated that radio penetration remained strong with a 96% weekly and 76% daily reach.

2.4 Total radio revenue is expected to grow at a compound annual growth rate of 3.9% over five years beginning in 2017 and reaching about R5.4 billion in 2021. Advertising revenue is likely to continue to form the largest element of total revenue, surpassing the R5 billion mark in 2020[2], pointing to the fact that radio remains a preferred medium of advertising campaigns.

2.5 Radio broadcasting in South Africa as in most countries relies heavily on analogue transmission. As the number of services expands, the frequency bands used for audio broadcasting become saturated. Many countries, including South Africa, are struggling to accommodate new or additional radio services through existing analogue technologies. In 2015 the Authority placed a moratorium on the licensing of new community radio stations due to frequency saturation. We are also made to believe that the primary markets of Gauteng, KwaZulu Natal and the Western Cape have run out of FM frequencies for commercial radio stations.

2.6 However, advances and innovation in broadcasting technology allows broadcasters to expand their services and reach out to more audiences, for example, by streaming their programmes via the Internet, thus allowing for ubiquitous consumption of media. This way, consumers will now be able to listen to the radio on their computers, smartphones or tablets anywhere, anytime. According to the latest report of the Broadcast Research Council of South Africa (BRC)[3], about 73% of people access audio broadcasting services using the radio, 37% use a mobile phone, 11% use a television, 3% use a computer and 25% listen to the radio from their cars. Rapid growth in urbanisation and an expanding middle class are driving growth in car ownership resulting in an increase in in-car radio listening. By the same

[2] PWC. Entertainment and media outlook: 2017 – 2021: An African perspective. 8th annual edition Sep 2017 https://www.pwc.co.za/en/assets/pdf/entertainment-and-media-outlook-2017.pdf

[3] BRC RAM & SEM – February 2018 Release. https://docs.google.com/viewerng/viewer?url=http://www.brcsa.org.za/wp-content/uploads/2018/02/BRC-RAM-FEBRUARY-2018-RELEASE-PRESENTATION.pdf&hl=en

token, an increase in smartphone ownership will drive radio-listening over the mobile phone[4]. This trend is likely to continue well into the future, and will be a source of growth for audio broadcasting services.

2.7 Satellite broadcasting also allows consumers to receive radio services via their television sets, in areas where they would otherwise be unreachable.

2.8 Furthermore, the advent of digital sound broadcasting around the world is thus coming at a time when broadcasters are seeking for innovative and efficient ways to expand their services beyond analogue transmission. It is for this reason that Kagiso Media welcomes the step taken by the Authority to undertake public consultations on the issue.

3. Digital Sound Broadcasting

3.1 In June 2006 the Regional Radiocommunication Conference (RRC-06) of the International Telecommunications Union (ITU), of which South Africa is a member, signed a treaty agreement in Geneva, ushering in the transition from analogue to digital broadcasting services for radio and television. The switch over to digitalization of broadcasting in Europe, Africa, Middle East and the Islamic Republic of Iran had a deadline of June 2015. Whilst many countries have made strides with respect to digital migration of television broadcasting, the same cannot be said of digital audio broadcasting.

3.2 The Report of the Digital Migration Working Group defines Digital Sound Broadcasting (DSB) as the use of digital modulation and compression to transmit audio programmes (music, news, sports, etc.) only[5].

Digital sound broadcasting promises many benefits including –

- the ability to broadcast multiple high-quality channels on each frequency;
- better sound quality for broadcasts;
- pause and rewind features;

[4] http://www.bizcommunity.com/Article/196/59/157061.html
[5] http://www.godigitalsa.co.za/files/Reports/Report%20of%20DBMWG/Report%20of%20the%20Digital%20Broadcasting%20Migration%20Working%20Group%20%20November%202006.pdf

- less opportunity for piracy;
- data display capabilities on receivers;
- opportunity for multicasting;
- real time information such as song titles, lyrics, genre, album details, programme guides, DJ details, etc.
- traffic navigation by means of transmitted digitized roadmaps, combined with positional information provided via the GPS system; and
- entertainment including games and non-commercial bulletin boards.

Question 1

Is there a need for the introduction of DSB technologies in South Africa? Motivate your answer?

4. Benefits of Digital Sound Broadcasting

4.1 Advances in broadcasting technology are inevitable. In our view, it is not a question of whether or not but rather of when such technologies will be introduced in South Africa. There are more than 35 countries that have introduced digital sound broadcasting around the world, mostly in Europe. South Africa has a lot to learn from these early adopters in order to avoid some of the mistakes committed. As indicated in paragraph 3 above digital sound broadcasting offers many benefits. We wish to highlight some of the benefits that accrue to broadcasters, consumers and the government. In its communication message government can point out some of these benefits as a selling point of digital sound broadcasting.

4.2 Advantages to broadcasters

4.2.1 In contrast to analogue transmission which allows one block of frequency to carry a single radio channel only, digital transmission enables a number of signals to be transmitted through a single frequency, thus eliminating the frequency scarcity challenge. Broadcasters such as Kagiso Media will be able to introduce new and additional services with no hindrances. Digital sound broadcasting also eliminates interference between transmissions,

especially as a result of frequency saturation, hence the result sound is of a much better quality. The use of green transmission infrastructure has the added advantage from an energy saving and environmental friendliness perspective.

4.2.2 Digital transmission allows not only sound but text, data, images and multimedia services as well. This creates vast opportunities for service expansion and content diversity for broadcasters. As with television broadcasting, content will become the driving force behind digital sound broadcasting.

4.3 Advantages to consumers

4.3.1 Digital sound broadcasting enhances consumer welfare through the provision of a diverse range of services and programme offerings. Niche channels can be developed to cater for specific sections of society, such as the youth and persons living with disabilities. Digital technology also provides better quality of service than analogue broadcasting. Whereas analogue transmission requires manual tuning in order to secure a channel, digital transmission relies mostly on text selection. The high compression capabilities facilitate greater service choice for consumers. Perhaps an important quality of digital audio broadcasting is interactivity between the listener and the system. The days of a passive listener are long gone. Through the internet, listeners are now able to interact with their hosts and among each other through various digital platforms such as social media, etc. Digital broadcasting will take this phenomenon even further and improve the listener's experience.

4.3.2 The use of analogue transmitters forces listeners on long distance travel to keep on re-tuning their radio receivers as they move away from the reach of one transmitter to another. Digital broadcasting eliminates this and allows listeners to stay on the same frequency throughout the country or region served.

4.4 Advantages to Government

4.4.1 Digital sound broadcasting facilitates the delivery of e-government services. Most governments around the world are introducing the delivery of services through the Internet

and other digital forms as a means of improving efficiency, reducing costs and enhancing the effectiveness of government services. Digital radio broadcasting, coupled with interactivity can assist in improving the interaction between government and its citizens and close the information gap.

4.4.2 From an economic perspective digital sound broadcasting is set to provide opportunity for the development of new skills, create new jobs and develop new investment opportunities. The introduction of new services means more revenue for government through licence fees and taxes. In an era of greater environmental awareness and responsibility, digital audio broadcasting saves on power usage up to 15 times better than analogue transmission thus contributing to government's move towards a green economy[6].

5. Policy considerations

5.1 Section 3 of the Discussion Document deals with the 'South African Environment'. The section has 2 subheadings entitled 'The Policy' and 'Legislative/Regulatory framework'. The discussion on the policy and regulatory framework is scant and as such we would like to address the policy and legislative/regulatory imperatives of digital sound broadcasting before responding directly to Question 2. It is our considered view that having a clear and formal policy framework is a critical and fundamental component of migration to digital sound broadcasting. In 2008 the Minister of Communications published the South African Digital Migration Policy, which aims to, among other things:

a) establish a policy environment within which broadcasting digital migration is implemented;
b) create an environment for the uptake of digital terrestrial television by television households, including the poor.

5.2 Unfortunately, the policy focuses mostly on digital migration for television services, and places less urgency on digital sound broadcasting. This has created a policy gap insofar as

[6] Economics of DAB+. Use it or lose it. https://worlddabeureka.org/2013/02/25/economics-of-dab-broadcasting-use-it-or-lose-it/

digital sound broadcasting is concerned. The importance of having a policy framework in place before migration takes place cannot be overemphasised. A policy framework is fundamental to this process and should address, among others, the following issues.

5.3 Industry Participation

5.3.1 Embedded in the Digital Migration Policy was the establishment of the Digital Dzonga Advisory Council (Advisory Council), formed of representatives of the Regulator, broadcasters, industry, consumer groups, government and members of the public. The Advisory Council's task included assisting the Minister and the department in implementing the Digital Migration Policy, developing an implementation plan for migration and providing a forum for discussion and decision making on matters related to digital migration. Although the Advisory Council was later dissolved in 2010, the idea of having a consultative and representative forum is good practice that has been implemented by many countries around the world to facilitate digital migration.

5.3.2 Whilst there has been some interactions between the Authority, Sentech and other broadcasters regarding the on-going trials on digital sound broadcasting, a much broader forum that includes receiver manufacturers, consumer groups and government needs to be established. A formally adopted policy should include this requirement with the terms of reference of such a group to be developed separately. We recognise the coordination role and work being undertaken through the Southern African Digital Broadcasting (SADIBA).

5.4 Accessibility and affordability

5.4.1 Universal access of broadcasting services, both sound and television, is a critical element of government's objectives to bridge the digital divide. As a result, government made it clear in the Digital Migration Policy that set-top-boxes (STBs) will be made affordable, by subsidising poor households.

5.4.2 There is no similar undertaking with respect to digital sound broadcasting. A lot of people especially in rural areas are still dependent on radio broadcasting as their only source of information and entertainment. These are mostly poor households who may not be in a position to afford a new digital radio receiver. In its 2005 discussion document, the Tanzanian

Communications Regulatory Authority (TCRA) found that the added value from digital radio is not yet apparent to justify the additional cost for the average consumer, although the prices of these receivers may be falling. Thus, without government support, it may be difficult for consumers to buy into the initiative and the whole digital migration programme for digital sound broadcasting may not take off.

5.4.3 Failure to assist poor households will further perpetuate the digital divide between the rich and the poor, urban and rural areas, which is contrary to general government policy of inclusive growth.

5.4.4 Whilst the affordability of radio receivers is important to incentivise consumers to switch, such receivers must actually be available and accessible. Policy must be clear in terms of the type of receivers to be distributed in the country as well as set the quality standards of the receivers and prescribe how such receivers must be sourced and distributed.

5.4.5 Consumers need to be protected from unscrupulous businesses who might take advantage of the migration to sell receivers that do not meet the set standards. The reliability and quality of receivers is important not only from a consumer protection perspective but also to foster trust and buy-in from citizens.

5.5 **Uptake and switch-off**

5.5.1 It is expected that after analogue television switch-off more radio frequency spectrum will become available to accommodate digital sound broadcasting in the allocated Band. Thus, digital sound broadcasting will most likely take root after digital television migration. However, unlike digital television that requires the switching off of the analogue signal, digital radio can co-exist with analogue radio that operates in the AM/FM frequency bands because there is no sharing of frequencies and the spectrum that may be released through migration is not required for other services. The only disadvantage is that radio broadcasters may have to incur high transmission costs of operating both digital and analogue systems at the same time.

5.5.2 Broadcasters are expected to acquire new digital equipment including production equipment and transmission equipment, in addition to investments already made in analogue

equipment. Thus switch-off, if necessary, must only occur when there is a critical mass of consumers with digital receivers, which justify the investments made and guarantees a return for broadcasters. Much the same way that consumers need to be incentivised to adopt digital receivers, it is also paramount that broadcasters are incentivised to invest in digital broadcasting equipment. We return to this issue in para 6.1 below.

5.6 Communication and awareness raising

5.6.1 A successful migration process is dependent on a comprehensive communication campaign to educate citizens and raise awareness. Listeners form a critical bedrock of a successful transition to digital audio broadcasting. It is therefore paramount that they are convinced of the benefits of switching to digital broadcasting. For instance, consumers who are already streaming radio services over the Internet may not see a need to switch to digital audio broadcasting and when the costs of data are eventually reduced, we anticipate an increase in the streaming of radio services over the Internet. Similarly, those who are already receiving radio services through satellite broadcasting may not see the added benefit of investing in a digital receiver. This phenomenon might have negative implications for the take-up of digital radio, where consumers do not see material benefits of such a move. This is a material threat to the successful roll-out of digital radio and requires a comprehensive communication campaign to educate citizens and raise awareness to mitigate against this risk.

5.6.2 Tanzania's TCRA noted in 2005 that most consumers are not aware of digital radio and find analogue radio to be good value for money. In the absence of communication and awareness raising campaigns the take-up of digital radio might be hampered. In Uganda, research undertaken to test the market's readiness for digital radio broadcasting revealed that there was very little to no knowledge of digital radio broadcasting among and its benefits and that the creation of awareness was considered as the single most important intervention.

Question 3
In the absence of a policy directive for providing a standard for DSB, should the Authority provide licences for other DSB technologies? Please motivate your answer

6. Regulatory framework

Flowing from government's policy framework, the Authority needs to put in place a clear regulatory framework that will govern the licensing, incentivising and general oversight of the digital radio broadcasting sector.

6.1 Licensing

6.1.1 The Authority needs to adopt a transitional strategy that prioritises current radio broadcasters and facilitates their migration to digital broadcasting. To start with, current broadcasters must be given an opportunity to undertake trials for a period of time. This will assist in terms of readiness, providing training to personnel, acquiring the necessary equipment and familiarising operators with the new broadcasting technology.

6.1.2 Notwithstanding the reliance on the completion of digital television migration, it is our contention that the Authority should in the interim commence the licensing of digital sound broadcasting on the frequency band currently used for the trials to incumbent broadcasters who have been participating in the trials. The Authority does not necessarily have to await the completion of digital television migration which continues to hamper the progress and growth of the broadcasting sector as a whole.

6.1.2 In order to incentivise current broadcasters to invest in new equipment and assets, and to be able to earn a return and recoup such investment the Authority must consider placing a moratorium on new sound broadcasting licences for a period of time. This approach was adopted in Australia where new digital licences were not granted for a period of six years in order to protect the investment made by incumbents. This approach also allows time to move

listeners to digital radio[7]. Radio broadcasters were also given the first opportunity to own and operate multiplexes in the form of joint ventures.

6.1.3 Similarly in Canada the digital sound broadcasting policy published by the Canadian Radio-television and Telecommunications Commission (CRTC), in 1995 outlined a two-staged approach of licensing current broadcasters on a transitional basis before opening it up to new players[8]. Incumbent operators who so wished would use digital facilities to provide a simulcast of their existing services.

6.1.4 Thus, we recommend that the policy and regulatory framework on digital sound broadcasting in South Africa should also allow incumbent broadcasters to simulcast their services during the transitional period. Since simulcasting comes at an added cost, it further justifies a moratorium on new broadcasters until after the transition.

6.1.5 It is also important that when granting licences for digital sound broadcasting the Authority should ensure that broadcasters have access to enough spectrum that allows effective broadcasting across the geographical boundaries. In Australia each existing commercial analogue station was given 128 kilobits free as an incentive, based on the principle of use it or lose it. If a radio broadcaster had two stations they were given 256 kilobits[9].

6.2 Infrastructure sharing

6.2.1 Digital audio broadcasting comes at a time when there's proliferation of ICT infrastructure around the country and will likely be implemented after digital television migration. Radio broadcasters can leverage on the existing passive elements of the communication infrastructure such as masts, transmitter houses, back-up generators and others. Whilst the market players can enter into infrastructure sharing agreements, this needs to be underpinned by policy and facilitated by a clear regulatory framework.

7

[8]O'Neill. B. Digital Audio Broadcasting in Canada: Technology and Policy in the Transition to Digital Radio. Canadian Journal of Communication. Vol 32 (2007) 71-90.

[9] Australian Broadcasting Corporation (2014, September), ABC Audience Research Data sourced from Nielsen (pre2014) and Gfk (2014).

6.3 **Multiplex ownership**

Multiplex ownership will depend on the digital broadcast network that will be adopted. If its a Single Frequency Network (SFN) that is adopted as the most suitable network then multiple different radio stations will transmit on the same frequency using the same transmitter. The commercial multiplex (for commercial broadcasters) should be owned by the commercial operators but operated by a third-party service provider. However, the regulatory framework should allow broadcasters to share the infrastructure and the costs of that single transmission. Depending on the licence condition stipulated by the regulator a broadcaster will be allocated bandwidth and only pay for that potion of service.

Question 2
Do you think the list of technical standards to which the DSB equipment must conform are exhaustive? Motivate your response and suggest other equipment technical standards?

7. Technical standards

7.1 ITU Radio Regulations divide the global radio spectrum into three (3) regions (Region 1, Region 2 and Region 3) with their own set of frequency allocations. The Eureka 147 DAB standard was adopted for countries in Region 1, including Africa and Europe. Eureka 147 is able to operate in the frequency ranges 174- 240 MHz (Band III and 1452-1492 MHz (L-Band). The Report of the Digital Migration Working Group recommended that the DAB+ and the Eureka 147 (Digital Audio Broadcasting) and the Digital Radio Mondiale (DRM) standards be adopted as complementary standards for digital sound broadcasting in South Africa. Various trials have been undertaken successfully so far, indicating the viability of the DAB+ standard.

7.2 It is not clear why this discussion document is being developed whilst the last phase of the trials is ongoing and incomplete. Stakeholders do not have the benefit of the results of the last phase of the trials to comment meaningfully on the success or otherwise of the standard.

7.3 However, lessons from the digital television migration process indicate that technologies evolve at a fast pace. Whilst DAB would have been a relevant standard a few years ago, it has become outdated and the DAB+ which is many times better is a new preferred standard. Whilst receivers that are DAB+ enabled can receive a DAB signal, those that are DAB enabled cannot receive a DAB+ signal. Countries that were early adopters of the DAB standard might endure the disadvantage of having of having to switch technologies all over again. Thus rather than stipulating a specific technology government should allow broadcasters to adopt a technology prevailing at the time of migration.

7.4 As already noted, a number of broadcasters are streaming their services over the Internet. It was noted in Australia that the growing availability of high speed internet, combined with the intergenerational change in listening habits and smartphone usage, indicates that digital radio delivered over the Internet has also become an alternative digital radio technology of choice[10]. If the licensing process of DAB+ is delayed, there is a real threat of South African consumers leap frogging DAB+ to Internet radio.

7.5 Whilst there is already a preferred technology, our position is that licensing must follow a clearly laid out policy framework. We believe that the Authority should engage robustly with the Department of Communications to develop such a policy directive and/or framework separate from the Broadcasting White Paper being mooted. The policy framework should adopt a flexible approach towards technology for digital sound broadcasting, allowing broadcasters to experiment with various technologies and adopting a suitable one that is prevailing at the time of migration.

[10] Digital Radio Report. https://www.communications.gov.au/publications/digital-radio-report

Question 4

South Africa through its international agreements at ITU and SADC level agreed on DAB+ and DRM systems. Please indicate which other digital sound broadcasting technology(ies) if any should be considered for South Africa? Please motivate.

This question is linked to question 3. Whilst South Africa has agreed to adopt the DAB+ and DRM systems for digital sound broadcasting, there is nothing preventing the adoption of other complementary technologies should they become available. As indicated, Internet radio is fast growing and so is access through satellite systems. In its 2013 Terrestrial Broadcasting Radio Frequency Plan the Authority indicated that the band 1452 – 1492 MHz was previously reserved for satellite and terrestrial digital audio broadcasting (S-DAB) and (T-DAB), and that the future use of this will band will be further assessed[11]. Given the number of technologies and the rapid changes entailed, South Africa should adopt a flexible approach to technology.

Question 5

To use the spectrum efficiently, the digital sound broadcasting network can be planned on a Single Frequency Network. Do you think that it would be applicable for purposes of digital sound broadcasting? Please motivate.

Single Frequency Network (SFN) is currently the best option for digital sound broadcasting networks. However, the question of who will operate the SFN is pertinent for the Authority to consider. It seems logical that if the SFN frequency licenses are licenced in geographical terms then the transmission service provider/s (E.g. Sentech or other independent service providers) would have to bid to be the operators of the SFN and the multiplex.

When the transmission service provider wins the bid, then they would then be responsible to put in place infrastructure for broadcasters. Broadcasters would then lease a channel from the SFN licence holder. However, this might negatively impact the broadcasters as this creates a monopoly, that is, the SFN license holder will be in a position to unilaterally hike lease prices which could be

[11] https://www.icasa.org.za/uploads/files/NatRadFreqPlan2013GG.pdf

too high for broadcasters. The Authority will need to consider measures to safeguard against this risk by rather awarding the multiplex licences to broadcasters directly. This enables the management of the multiplex on commercial terms rather than on monopolistic activity. In addition, this will stimulate investment by enabling more service providers to enter the market that manages the technical broadcasting infrastructure.

Furthermore, the Authority will have to set guidelines on channel composition on the SFN frequency. For an example, if a single SFN is licensed to carry 18 channels. They would need to be allocated as such:

- 40% commercial content distributes.
- 40% public content distributers.
- 20% community content distributers.

Question 6

6.1 Should the Authority consider one or more mux operator(s) for DSB? Please motivate.

6.2 Would you propose a total switch – off of the traditional analogue AM and FM sound broadcasting? Please motivate.

6.2 In its 2013 Terrestrial Broadcasting Frequency Plan the Authority indicated that a switch-off date for AM and FM transmission in South Africa would not be set. It further stated that digital audio broadcasting would be an additional audio service available. Most countries have not set a switch off date. Only Norway has completely switched off to digital audio broadcasting. A complete switch off of analogue transmission is not necessary for the following reasons:

a. the ITU has not prescribed a mandatory switch off;
b. digital radio can co-exist with analogue radio that operates in the AM/FM frequency bands because there is no sharing of frequencies; and
c. the spectrum that may be released through migration is not required for other service;
d. most countries have not set a switch off date and are rather adopting a gradual approach to digital

We do not think that a complete switch off is feasible in the short to medium term. South Africa should consider a total switch off only when a critical mass of consumers have access to digital receivers and the incumbents have recouped their investment in digital equipment. The Authority should set the benchmark (E.g. 60 per cent population uptake) as the point at which the Authority can then set the date for the digital radio switchover.

Question 7
Should the Authority adopt the strategy used in other international markets of licensing DSB services in the primary markets first and then a nationwide rollout? Please motivate.

Kagiso Media submits that the strategy of licensing DSB services in primary markets first may be prudent owing to the saturation of frequencies for analogue broadcasting in these areas.

Question 8
Can the current sound broadcasting market afford new DSB licensees in community, commercial and public service? In your answer, explain your reasons and/or choice for any of your submission.

As stated in section 6.1 we recommend a moratorium on new licences during the transitional period as an incentive to incumbent broadcasters to invest in new equipment and assets, and to be able to earn a return and recoup such investment. This will also allow time to move listeners to digital radio. Both Australia and Canada adopted this approach of first licensing current broadcasters on a transitional basis before opening it up to new players.

Conclusion

Kagiso Media appreciates the opportunity of making these written submissions on the Discussion Document on Digital Sound Broadcasting and further confirms its willingness to make oral

representations should the Authority undertake any further consultative process such as Public Hearings.

Yours sincerely

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