



**NATIONAL COMMUNITY  
RADIO FORUM (NCRF)**

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*An Association  
Incorporated Under  
Section 21 - Reg. No.  
2001/019455/08*

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**RE: NCRF SUBMISSIONS ON DISCUSSION DOCUMENT ON DIGITAL BROADCASTING**

**Executive contribution**

It must be acknowledged that community radio has never featured prominently in the discussion of digital migration. Although commercial and public radio stations have either government support or capital to migrate easily, community radio rely on the Department of Communications and the Media Development and Diversity Agency, both operating at extremely inadequate budgets for support.

Secondly, community radio stations, in nature and by design are meant to serve the remote and most rural communities, where economic environment is not as thriving as metropolitan areas. The key to this is the accessibility to the station and its ability to speak to the people of that area. The digital migration must ensure to retain this feature and ensure the stations remain focussed in the local area they serve to avoid stations aiming and focusing on urban areas for economic reasons and neglecting their immediate constituencies.

Lastly, as the regulator decides with the best route regarding the migration, it must be observed that radio is what it is because of its cheap and/or affordability nature. The migration should acknowledge this characteristic and in a situation where a special device will be required to access radio, the regulator should motivate for subsidised devices, as it is done in television.

**Question 1 – Is there a need for the introduction of DSB technologies in South Africa? Motivate your answer:**

The digital space promises to allow more stations with much better quality. With this pillar in broadcasting, it is indeed important to migrate to the digital space. The current moratorium in issuing of licenses by ICASA already shows how the FM spectrum was under severe pressure. Not issuing licenses limit the diversity of voices and access to broadcasting services to marginalised communities. NCRF wishes to submit a critical request that the regulator is vigilant in conversion of licenses and issuing of new ones. Thorough and due diligence will be appreciated in order to rectify the cluttering or station in same areas all being licensed. Considering the special nature of community radio, to rather opt for co existing of both DAB and FM instead of immediate switch off. This will allow the sector to figure itself out in the process. The transition must be managed and regulated moving from the current regime to the next regime. ICASA must develop a transitional mechanism in consultation with stakeholders.

**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**

The digital space is a fast paced one and changes frequently. Radio broadcasting has always been a well-regulated during the FM spectrum day. NCRF opt for the adoption of the technical standards that are in line with the ITU. This will provide the regulator sufficient ground to direct the growth and further exploration of the DAB and DSB instead of adding anything out of the ITU specification which might not be sustainable in a long run.

In addition to this, there must be a standard generating body to study and understand the current nature of the transition. The body must in a collective be reflective of the general stakeholders to study the technicalities of the process without leaving other players behind.



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

In terms of the technical exercise or current spectrum licensing, Community Radio can self-provide own technology. Therefore, the standard must not be monolithic, it must be an open standard to allow Community Radio to develop its own technology and prototype to be supported by the regulatory regime. It must allow for broader participation from prototype to a readiness technology to market by licensees and non-licensees because some of the technology can be a developed technology for commercialisation.

In the absence of a standalone policy, one relevant policy should be able to kick in. First and foremost, South Africa being a signatory to the ITU, the ITU policy framework should be able to guide the licensing in DSB, however, the NCRF wishes to put forward a much faster process of publishing of the policy which engages contributions from other departments such as DoC and GCIS.

### **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:**

ISDBT – This is an integrated technology that can expand systems to other broadcasting mechanism like mobile technology broadcasting services, satellite technology, development of WIFI and other telecommunication services. DRM and DAB+ limits capacity for expansion to some of this services.

**Question 5 – To use 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:**

As per the discussion document by ICASA, and the ITU framework, DAB+ and DRM systems can function on both single frequency and multi-frequency networks (SFN/MFN). Although both systems have been trialled in South Africa, only the DAB+ system was trialled on a SFN. With its potential ability to cover a wider area, it will be heavily important to ensure monitoring and compliance in ensuring that community radio sector remain focused in its geographic communities.

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

NCRF Will like to know, firstly if the ECA have any provisions in the ECA for a mux operator licence category, if no, ICASA may therefore want to consider developing a framework to determine who can be licenced as a mux operator and clearly set out the requirements.

It must be clearly understood that the NCRF is not opposed to multi-operator system. The authority must expand the mux operators. Having more mux operators will assist Community Broadcasters to propagate to other different devices.

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

**Consideration for Community Broadcast Organisations:**

NCRF wishes to submit a co-existence of DAB and traditional FM for a specified period. As indicated previously community radio has not heavily featured in the conversation of DAB. And with the larger portion of the sector relying on government funding, it will be important to allow the process to unfold with no station being off air as a result of a switch over. However, the regulator must set the specific time in order for the roll out process in community radio to move faster.



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Similar approach was adopted in Kenya, by implementing a dual illumination (simulcast) period of three years from 2009 to 2012 during which analogue and digital broadcast would be simultaneously broadcast.

### Consideration for Citizens:

There must be a transition and it must have a parallel process because many people especially in rural areas still rely on FM band Radio Sets. A period of between 3 to 5 years must be allowed for consumers to be able to obtain consumer premises equipment (CPE). A total shutoff will cause unintentional marginalization to many who rely on the FM Band Sets.

### 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:

With the ITU being the hallmark of this process, NCRF moves for a licensing procedure that is not necessarily similar to any international market but rather conducive to the broadcasting environment in the country.

The important factor will be to ensure the alignment of the regulatory specifications to the ITU framework.

### 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

Members of NCRF service largely with grants from the government and MDDA. It will be largely important for the regulator to conduct a feasibility study which will look into various socio-economic factors which the stations are faced with on daily basis. With stations existing in various settings of the society, a blanket approach of affordability will not be applicable. This can already be seen with regard to signal distribution. Where by some stations are able to service their service their monthly instalments regularly while others, without government intervention, will severely suffer.

**Conclusion**

NCRF, borrowing from the success those who walked before us, Kenya, and it owes its level of success to stakeholder engagement, setting and Defining responsibilities and set goals establish legal framework for flexible regulation, lastly develop appropriate policies.

As a key stakeholder representing a special and unique tier of broadcasting, we wish to appreciate the opportunity offered to make contributions to the discussion document and invite the regulator and government in general to further engage with the forum to deepen representation of the sector to ensure a conducive environment which will give birth to a compliant, sustainable and professional sector.

The NCRF wishes for an option to make additional comments and oral representation to allow for more time to broaden consultations with various stakeholders within the Community Radio sector.