Submission on ICASA's Digital Sound Broadcasting Discussion Paper

Panel

- Dr Roelf Petersen – Managing Director, PMG
- Mr Chris Joubert – MD, Broadcom
- Prof. Justine Limpitlaw – Electronic Communications Lawyer
- Mrs Wilma Van Schalkwyk – Senior Manager, Radio and Chair, Community Radio Committee, NAB
- Rev. Karel Verhoef – COO, Radio Pulpit

Overview

- Introduction to the Pulpit Media Group
- Answering of Specific Questions Raised in the DSB Discussion Paper, in order

Introduction to the Pulpit Media Group

- The Pulpit Media Group is a Christian non-profit organisation that has two class community sound broadcasting services in its stable:
  - Radio Pulpit: broadcasting for 37 years in Gauteng
  - Cape Pulpit: licence granted in 2012, broadcasting in the Cape
  - Both broadcast on MW analogue

Introduction to the Pulpit Media Group

- PMG and Broadcom has pioneered, in collaboration with Sentech, DRM30 testing in South Africa
- ICASA is in receipt of all DRM30 test results which the ITU has included in its test library
- PMG and Broadcom received an international award from the DRM Global Consortium for the Promotion of DRM in Africa in 2017

Question 1: Is there a need for digital Radio in SA

- SA is a key DSB test case:
  - FM spectrum is congested
  - AM spectrum, although available, is not viable for most broadcasters given poor sound quality and high cost of analogue AM broadcasting
  - Mix of urban/rural populations – requiring both DAB and DRM standards
  - 11 official languages – many indigenous languages are greatly underserved nationally
  - Emergency Warning System can be implemented nationally
  - The rollout of DSB can be effected quickly as DRM can be rolled out immediately

Question 1: Is there a need for digital Radio in SA (cont)

- SA is a key DSB test case:
  - DSB is a spectrum-efficient technology
    - unlocking investment and spurring a range of economic activity and resultant local job creation eg assembly or manufacturing of digital receivers
  - DSB contributes to a more efficient broadcasting environment
    - Energy efficient “green” technology
    - DRM has cheaper signal distribution costs
    - Greater diversity of services to audiences – digital dividend

Question 2: Technical Standards

- SA is a member of the ITU and must be guided by the DSB standards that have already been adopted for Region 1 ie DAB+ and DRM (also adopted by BRICS countries).
- In addition to the listed standards, the relevant ETSI standards applicable to DRM must be included in SA's national standards:
  - ETSI ES 201 980 (DRM System Specification)
  - ETSI TS 102 340 (DRM Receiver Status and Control Interface – RSCI)

Question 2: Technical Standards (cont)

- Both DAB+ and DRM can be implemented to operate within existing frequency plans allocated to FM and AM ie to coexist and operate simultaneously with analogue devices
- Consequently, SA must ensure that multi—standard receiver technology is mandated to ensure the availability of both analogue (FM and AM) and DSB services (both DAB+ and DRM) to audiences

Question 2: Technical Standards (cont)

- While DAB+ requires VHF spectrum to be freed up as a result of migration from analogue terrestrial television to DTT, this is not the case for DRM (DRM30 and DRM+)
- Consequently, ICASA must proceed to license DRM-based services in order to encourage DSB receiver set take up

Question 3: Should ICASA wait for DSB Policy Before Licensing?

- Technology neutrality is a key existing principle of the ECA
- Consequently ICASA should proceed to licence DAB+ and DRM services as soon as possible even in the absence of formal DOC DSB policy

Question 4: Which other standards ought to be adopted?

- No standards other than DAB and DRM ought to be adopted
- Standards adopted in ITU Regions other than Region 1 of the ITU ought not to be adopted in line with the CRASA resolution.
- DAB standard means DAB+
- DRM standard means DRM30 and DRM+

Question 5: Should the DSB network be single or multi-frequency?

- Both single and multi-frequency networks should be allowed
- Consequently both should be licensed as required/applied for on a case by case basis
- PMG made technical corrections to Table 4 in our written submissions

Question 6.1: Should ICASA consider one or more MUX operators for DSB?

- No because this would create a monopoly which would lead to:
  - abuse of monopoly power
  - a lack of variety of service providers and customer-focused incentives
  - increased costs for broadcasters

Question 6.2: Should there be a total switch off of AM/FM broadcasting?

- In principle PMG supports a total switch off – only way to achieve the full benefit of the digital dividend ie through alleviating FM spectrum congestion
- But PMG recognises that few countries have achieved a total switch off so ICASA should adopt a wait and see attitude
- Is receiver sets are affordable and there is no listener backlash – no reason not to

Question 7: Should DSB be licensed in primary markets first?

- International Benchmarking exercise is problematic:
  - Why the focus on developed countries instead of other developing countries such as the BRICS?
  - Why focus on three countries outside of ITU Region 1, particularly on standards issues?
  - Why focus on mono instead of multi-lingual countries?
  - Why Singapore? A tiny, urbanized country where DAB-only makes sense.

Question 7: Should DSB be licensed in primary markets first? (cont)

- The issue is not one of primary vs secondary markets – the key issue is spectrum availability
  - While the most FM congestion is in primary markets, the slow pace of DTT means that this will be difficult to alleviate in respect of FM spectrum
  - Broadcasters should be allowed to provide both analogue and DSB services where possible
  - DRM30 is immediately possible as there is no spectrum scarcity in the AM bands and would result in reduced spectrum costs
  - DRM+ can also be licensed to alleviate the FM spectrum congestion

Thank you


PULPIT MEDIA GROUP
Questions?
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