

# **Radio Maluti Response to the request from ICASA for comments on GG 43707 and GG 44488**

The Authority is thanked for the opportunity to comment on Government Gazette 43707 dated 11 September 2020 and on Government Gazette 44488 dated 23 April 2021.

## **Comments on GG 43707**

The provision that an AGM must be held within 90 days of the end of the national state of disaster is noted and will be adhered to.

## **Comments on GG 44488**

Radio Maluti only wishes to comment on the following sections: 16, 17, 18, 20, 21 and 22.

### **Section 16: Broadcasting Performance Period**

#### **Our understanding**

The broadcasting performance period (BPP) means the period during which the Authority monitors the on-air broadcast of the radio station for compliance with local content, licence conditions and regulations etc.

16.1

Noted.

16.2 (a)

The lockdown impacts on the BPP as the curfew times imposed during lockdown may prohibit radio station staff from being on the premises during the BPP times.

16.2 (b)

Most radio stations revert to automated broadcasts and re-broadcasting of programmes outside of the BPP.

It is suggested that the current performance period be amended to 06h00 to 21h00 in view of the eased lockdown restrictions.

It is proposed that these hours be applied as the standard for community radio, going forward, because it represents the times during any 24-hour period when most people are listening to their favourite radio station.

### **Section 17: Programme Syndication**

#### **Our understanding**



Programme syndication means programmes produced at a central hub, distributed and broadcast simultaneously by broadcasting licensees, or rebroadcasting the same program on one or more different radio stations.

17.1

Noted.

17.2 (a)

Programme syndication has the advantage that less time and costs need be spent by the broadcasting radio station on programme production. It also provides more variety in terms of programming.

Usually only the programmes that have proven to be very popular amongst the listeners of the originating radio station are made available to other radios stations for re-broadcasting.

It also alleviates the need for presenters to be at the studio, as the syndicated programme/s may be broadcast during automated periods, with no presenters in the studio.

Syndication of programmes also serves as another source of income for the syndicating (recording) radio station.

In view of the eased lockdown, we are of the view that the permitted percentage of syndicated programmes may be decreased to 30%.

It is proposed that the 30% quota be applied as the standard for community radio, going forward.

## **Section 18: Quarterly programming logs and recordings**

### **Our understanding**

Quarterly programming logs and recordings are the backbone of the compliance monitoring conducted by the Authority.

18.1

Noted.

18.2 (a)

No justification can be found for the suspension of programming logs and recordings during lockdown, if these are permitted to be sent electronically via email.

It is thus recommended that quarterly programming logs and recordings be re-instated, but in electronic format only (also for delivery to the Authority).

## **Section 19: Written representations to address broadcast coverage requirements**

19.2 Where broadcast coverage -or the lack of it – was not a priority before COVID-19, the pandemic has shown the need for much better coverage, especially in isolated communities. The successful dissemination of information is of utmost importance.

## **Section 20: Submission of applications**

20.1

Noted.

20.2 (a)

We all need to become environmentally responsible. Submitting applications electronically during lockdown proved to be both time-saving and cost-saving.

It is strongly recommended that the Authority not revert back to the submission of hard copies during the eased lockdown and even once the national state of disaster has ended.

What the pandemic has taught the world is that it is possible to work effectively and efficiently from home using electronic and other media aids. This also resulted in huge savings on the costs of travel, accommodation etc.

The plea to the Authority is not to take a step back to the costly and time-consuming methods of the past.

20.2 (b)

No comment.

## **Section 21: Local Content Obligations**

21.1 It is noted that sound broadcasters must comply with local music quotas during lockdown.

21.2 (a)

It is proposed that the existing exemptions remain in force for the duration of the national state of disaster.

21.2 (b)

No further comment.

## **Section 22: Community Broadcasting Services**

22.1

Noted.

22.2 (a)

The eased lockdown restrictions do not take into account the possibility of a third and fourth wave of COVID-19 infections.

It is thus considered prudent to maintain the status quo on community and AGMs until after the end of the national state of disaster, or even until health experts advise that the pandemic is finally over. Even then, it would be prudent to continue wearing masks, sanitizing and maintain social-distancing.



However, the need to communicate with the members of the community and with the members of the radio station is even greater during lockdown. Radio stations are businesses that have to work hard to stay on the air during a national disaster. They keep the communities informed, in a healthy state of mind and all this while trying to survive financially themselves. It is imperative to remain a community radio station under these circumstances, which means that the community needs to be informed, consulted and allowed to voice its views.

Both programming schedules and leadership are impacted when staff or directors become ill, resign or die. If the pandemic continues for another year, the communities will become more isolated from the radio stations while waiting for an AGM as in pre-Covid - 19 days.

To preserve compliance with pandemic protocols, other methods of communication with the community may be considered e.g. :

- Regular and timely on air announcements
- Telephonic communication
- Group SMS
- Group emails
- Whatsapp groups
- Other media platforms
- Printed media

Email communication, especially in terms of voting and decision-making, includes what is sometimes referred to as the 'round-robin' method: the subject on which is to be voted is sent to all members who can then exercise their vote and/or comment and return it to the Board Secretary for collation of the voting results.

This has the advantage during lockdown of not delaying decisions on urgent and important matters affecting the radio station.


#### 22.2 (b)

It is suggested that this restriction only be lifted once the Authority resumes its operations from its offices rather than from home, as is/was the case during lockdown.

#### 22.2 (c)

It is recommended, so as not to encourage large gatherings of people during the pandemic, that applications for special event licences for none-COVID-19 purposes remain suspended until after the national state of disaster has been terminated.

Signed at Bethlehem on the 7<sup>th</sup> day of May 2021

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EF Mielmann: Managing director