



Attention: Mr Ndumiso Dana
Email: ndana@lcasa.org.za

8 January 2021

Dear Mr Dana

DRAFT DIGITAL SOUND BROADCASTING SERVICES REGULATIONS: SUBMISSIONS BY RADIO PULPIT

1. INTRODUCTION

1.1. Radio Pulpit is a community sound broadcasting services licensee.

1.2. In Notice 639 published in Government Gazette No. 43900 dated 13 November 2020, Icasa published its Draft Digital Sound Broadcasting Services Regulations (the Notice) the submission date for which was extended by Notice 721 published in Government Gazette No. 44000 dated 15 December 2020 to 8 January 2021.

1.3. Radio Pulpit thanks the Authority for the opportunity of providing it with these submissions and formally requests the opportunity to participate at its oral hearings to be held in respect of Digital Sound Broadcasting (DSB), if any.

2. RADIO PULPIT AND DRM

2.1. As Icasa is aware, Radio Pulpit has been a leading proponent of DRM technology in South Africa and has been extremely excited about the possibilities that digital sound broadcasting services opens up for the broadcasting sector.

2.2. Besides the relatively poor sound quality of MW signals which has hampered Radio Pulpit's growth, Radio Pulpit has always wanted to expand its Christian community of interest-based broadcasting is services to reach the population as a whole. It is of the view that DSB, and particularly DRM plus (given the expanded geographic coverage potential of DRM relative to DAB+) signaled a possible end to spectrum scarcity for the community broadcasting sector and an end to the sound quality concerns that have plagued MW transmission.



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2.3. It is for this reason that Radio Pulpit, together with Sentech, applied for and was granted a test licence and various extensions thereto, in order to carry out, at their cost, the DRM tests in South Africa. The results of their joint research/testing have been made available to Icasa¹. Radio Pulpit is justly proud of the work that it has done in being a driving force for DSB in South Africa.

2.4. Consequently, Radio Pulpit participated actively:

2.4.1.as Icasa is aware, in making submissions on Icasa's Draft Position Paper on DSB which resulted in the DSB Position Paper published in Notice 164 published in Government Gazette No. 42337 dated 29 March 2019 (the Position Paper); and

2.4.2.in making submissions to the Department of Communications (the DOC) on its Draft Ministerial Policy Direction on DSB which resulted in its DSB Policy Direction published in Notice 759 published in Government Gazette No. 43514 dated 10 July 2020 (the DSB Policy Direction).

3. THE CURRENT MARKET ENVIRONMENT

3.1. In the now seven years that have elapsed since the beginning of the DRM tests in 2014, Radio Pulpit is concerned that the market proposition for DSB, perhaps particularly DRM, may be waning.

3.2. The potential for this to have been has long been recognised as even the International Telecommunications Union never envisaged an analogue sound broadcasting switch-off date, unlike the analogue terrestrial television switch-off date of 17 June 2015. As ICASA must be aware, numerous market commentators have sounded the alarm about the viability of DSB in the era of online streaming and other audio services^{2 3}

3.3. There have undoubtedly been DRM success stories - India⁴ for example. But India's successful move to DRM was enabled by active lobbying of car manufacturers in India to encourage the installation of DRM receivers as a standard feature in cars aimed at that market⁵ and ensuring that DRM receivers are affordable for its population. Sadly, despite the obvious need for such encouragement in South Africa as noted in the DRB Policy Directive, DSB receivers (and particularly DRM-enabled ones), are not:

¹ http://www.drmsa.org/wp-content/uploads/2019/08/SEN_RFN_REP_MEASM_DRM30_RADIO_PULPIT_FINAL_REPORT_V1_04.pdf

² https://www.theregister.com/2018/05/22/digital_future_is_not_dab/

³ <https://www.stuff.tv/news/dab-radio-dead-in-water>

⁴ https://www.trai.gov.in/sites/default/files/DRM_Consortium_05092017.pdf

⁵ <https://www.radioworld.com/industry/drm-cites-progress-on-the-receiver-front-in-india>

3.3.1.available as a standard feature in cars

3.3.2.being manufactured locally; and

3.3.3.available to consumers at prices that are in any way comparable to those of analogue radio receivers.

3.4. Further digital audio technology has, quite simply, taken a different turn as a result of the internet. Radio Pulpit has been astonished at the speed with which its listeners, even older ones, have taken to streaming its service online. Car manufacturers are recognizing the demand for smart-phone compatible audio and have adapted accordingly to ensure these features are standard in newer models.

4. WHAT DOES THIS MEAN FOR DSB?

4.1. Spectrum scarcity and audio quality are moot in a broadband online environment. These are obviously the two single biggest drivers of the transition from analogue to digital sound broadcasting.

4.2. It remains to be seen which way South African audiences will jump. Experience in Europe has shown a reluctance on the part of audiences to move to DSB. On the other hand, both India and China⁶ have embarked on ambitious DRM programmes. These are issues that regulators and operators cannot impose. Audience take-up of DSB is dependent on market forces – particularly, the availability of excellent content, convenience, and affordability.

4.3. Radio Pulpit welcomes the fact that ICASA has recognised the ability of existing sound broadcasters to broadcast on DRM or DAB+ too, as is clearly intended in the wording of the Notice. However, merely being entitled to do so does not mean that all broadcasters will or could avail themselves of the opportunity.

4.4. Radio Pulpit queries why the Notice says very little about the costs of dual illumination (something that is likely to be required to be on-doing if the European example is anything to go by). Radio Pulpit was, in terms of its test licence with Sentech, entitled to self-provide its DRM test services. As has already been pointed out, it bore the costs of those, together with Sentech. But as a non-profit class community broadcaster, it cannot be intended, surely that it (and all other community broadcasters) are to pay for the costs of dual illumination until a formal policy decision has been taken as to whether not to move all sound broadcasting services onto digital platforms?

4.5. Radio Pulpit has commissioned a study of the proposed costs of dual illumination. Even supposing it was able to provide its service over the same transmitter used for the test licences, the signal distribution costs would ramp up by more than 30%. If it were required to obtain such services commercially, these are likely to be much more... in order of double existing signal distribution costs. Either option is, currently, unaffordable for Radio Pulpit.

⁶ <https://www.radioworld.com/news-and-business/china-makes-its-drm-move>

4.6. Radio Pulpit is of the view that the Notice, while long overdue in some respects, is also premature because as a matter of national policy, there is no plan for national cost coverage in respect of the dual illumination period. As Icasa is well aware, the community broadcasting sector as long experienced affordability constraints with regards to signal distribution with the DOC having had to step in to cover broadcasting signal distribution costs for numerous community broadcasters over the years. It is inconceivable that community broadcasters would be able to pay for dual illumination in an environment when the cost recovery from audiences would be impossible given the lack of take-up of receivers at this time.

4.7. Radio Pulpit is of the respectful view that the dual illumination payment issue be addressed before the publication of the final regulations introducing DSB, including via deliberations spear-headed by ICASA and involving: government, the Media Development and Diversity Agency and the Universal Service and Access Fund which is also available to fund the roll-out of broadcasting services such as DSB in terms of the Electronic Communications Act, 2005.

5. Radio Pulpit thanks the Authority for the opportunity of making these submissions and reiterates its desire to make oral presentations at the hearings.

Kind Regards

Yours Faithfully

A handwritten signature in black ink, appearing to read 'K. Verhoef', with a long horizontal stroke extending to the right.

Rev Karel Verhoef

CEO : Radio Pulpit