

# SABC SUBMISSION ON THE ICASA DRAFT FINDINGS DOCUMENT IN THE INQUIRY INTO SUBSCRIPTION TELEVISION BROADCASTING SERVICES, 2019

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## **SABC PANEL**

1. Philly Moilwa : Head of Policy and Regulatory Affairs

2. Merlin Naicker : Group Executive - Television

3. Lungile Binza : Group Executive - Technology

4. Reginald Nxumalo : Group Executive - Commercial

**Enterprises** 

5. Gary Rathbone : Head of Sports

6. Mathapelo Matsaneng : Senior Legal Advisor- Intellectual

**Property Management** 

7. Judy Monyela : Manager - Regulatory Compliance

8. Angie Hammond : Head of Market Intelligence

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#### INTRODUCTION

important issues raised in the inquiry

The SABC welcomes ICASA's initiative to review competition in the subscription television market
We take note of the fact that it's now almost five years that the review process has been running and a number of developments have happened in the industry.
The most significant development is the publishing of the White Paper on Audio

☐ The SABC however hopes that this initiative on subscription broadcasting would result with clear findings and a revised regulatory framework for Subscription and Free To Air television markets.

and Audio Visual Content Services (AAVCS) which deals with a number of



#### **SABC's Mandate**

☐ Broadcasting Act (1999, as amended) serves as a blueprint for the SABC's Public Service mandate. ☐ Public Service Division consists of 15 (fifteen) radio stations and 2 (two) Full-Spectrum multilingual television stations (SABC 1 and SABC 2) ☐ Commercial Service Division consists of 3 (three) radio stations and 1 (one) television station (SABC 3). ☐ The SABC currently has a 24-hour News Channel, as well as 19 (nineteen) radio stations (including Channel Africa) positioned on the subscription broadcasting platform. ☐ The SABC's digital multiplatform strategy is to keep pace with consumers in the market, as OTT and streaming capabilities become more feasible to the market.

## **Overview of the SABC Submission**

## **Summary of the SABC's submission**

There is a need for sector-specific regulations in the area of subscription broadcasting
services with the view to safeguard the sustainability and viability of public broadcasting
services or free-to-air services;
The Must Carry Regulations should be repealed in order to level the playing field (as per
the proposal within the AAVCS Draft White Paper);
Premium content has to be defined and regulated in order to foster accessibility of
premium content to all;
On imposition of licence conditions on a dominant broadcaster, it is submitted that all
suggested measures, namely: reducing contract duration, unbundling of rights, rights
splitting and Wholesale must-offer should be employed;
On shortening of exclusive contracts, ICASA should look into the risk of lengthy contracts
concluded to circumvent the new regulations on subscription broadcasting;
The studios should split the rights for access to content and as such pay-tv should compete
for pay-tv rights with no impact to TV operators



## **Overview of the SABC Submission, continues**

- ☐ On Hollywood Movies, the regulations should narrow the window period and allow other broadcasters to access these movies within a 12 months window period during which such premium movies will still be considered viable for meaningful commercial exploitation
- On advertising revenue, the Authority should urgently fast track the review of Advertising regulations as recommended by the AAVCS white paper.
- On digital migration project, the tech-neutral principle should be applied across the 3tiers of broadcasting. SABC should be allowed to use DTH without limitations given the efficiencies of this technology; and
- ☐ On the collection of TV Licence Fees, the SABC had submitted that the regulations and legislation should be reviewed to oblige additional entities to report on their usage of TV sets. The SABC submits that this matter will be addressed through the AAVCS Draft White Paper as these matters must be reviewed by the Minister/DCDT through a policy process



## **OVERVIEW OF THE DRAFT FINDINGS**



#### **OVERVIEW OF THE DRAFT FINDINGS**

- ☐ With the Draft Findings, the Authority is commended for seeking to implement measures to promote the development of the three tiers of broadcasting.
- ☐ South Africans deserve universal services and the associated access to broadcasting services.
- ☐ The SABC, however, emphasizes that the playing field within the broadcasting sector should be levelled and thus the Authority should regulate as a Chapter 9 Institution (see *S. 192* Constitution of the Republic)

## **OVERVIEW OF THE DRAFT FINDINGS, CONTINUES**

- ☐ The SABC is supportive of the following aspect as reflected within the Draft Findings:
- a) Not all content is substitutable i.e. Live Sports cannot be substituted by Drama as an example.
- b) SABC posits that there should be distinguishing between premium and non-premium content in order to detangle barriers to entry and inaccessibility of premium content for the public and broadcasters
- c) The multi-faceted approach by ICASA is endorsed by the SABC. ICASA's position is viewed as prospectively ending entrenched anti-competitive practices in the broadcasting sector.
- d) Licensees with substantial/significant market power should have licence conditions imposed on them dealing with (i) the unbundling of rights; (ii) rights splitting; (iii) wholesale must offer; (v) reduction in duration of contracts; (vi) limiting access to the number of Hollywood studios as dominant market player may have.

## **OVERVIEW OF THE DRAFT FINDINGS, CONTINUES**

- e) The SABC holds the view that Multichoice has substantial market power, as reflected by its high market share. The nature of its vertical integration has a harmful effect on competition in the sector.
- f) Multichoice serves as a the sole broadcaster operating with a significant market power, this has put it in a monopolistic position within the sector;
  - (i) controlling the retail distribution of basic-tier subscription TV services and satellite FTA television services;
  - (ii) controlling the retail distribution of premium subscription TV services;
  - (iii) controlling the wholesale supply and acquisition of premium content for distribution in South Africa

## **OVERVIEW OF CONCURRENT JURISDICTION**



#### **OVERVIEW - CONCURRENT JURISDICTION ON COMPETITION MATTERS**

- ☐ The SABC acknowledges that in terms of section 67(8) of the ECA, the Authority and the Competition Commission ("the Commission") have concurrent jurisdiction on competition matters with respect to the broadcasting industry.
- ☐ Furthermore, the SABC would like to provide a snapshot of the decision by the Commission to withdraw the complaints levelled against Multichoice for its abuse of its dominant position in the broadcast market.
- ☐ The Commission had concluded that it is within the jurisdiction of the Authority to provide regulatory intervention in the sector.
- ☐ In the SABC's purview, the Commission had indeed made appropriate and substantive conclusions, accurately assessed the market failures and agrees that sector-specific regulatory intervention is urgently required.

## **OVERVIEW - CONCURRENT JURISDICTION ON COMPETITION MATTERS (cont.)**

- The Commission assessed potential market failure in the realm of broadcast rights services in South Africa and thus made several findings for the benefit of the Authority to address such a potential market failure through regulatory intervention. The findings include:
  - (a) A high concentrated nature of subscription broadcasting market;
  - (b) Significant barriers to market entry and the inability of existing players to grow within the market;
  - (c) Limited credible alternative buyers of premium sports rights, other than Multichoice;
  - (d) Limited credible alternatives to which individuals could opt for, should they require to switch from Multichoice.
  - (e) Extensive contracts between the incumbent (Multichoice) and some contract suppliers
- MultiChoice has pushed the rights beyond the reach of FTA broadcasters and further sub-licence these rights and then prescribe how advertising sales should be executed, which seeks to only preserve their own advertising activities

# **OVERVIEW - CONCURRENT JURISDICTION ON COMPETITION MATTERS (cont.)**

- ☐ The SABC is therefore in full support of the Commission's reasoning that the Authority should regulate the potential market failure in the broadcasting services industry as the Authority has:
  - a) the mandate to create and/or foster competition in the broadcasting services industry through various regulatory avenues e.g. rights unbundling and splitting to eradicate barriers to market entry or expansion in the market by all;
  - b) the responsibility to regulate broadcasting in the public interest as required by section 192 of the Constitution of the Republic of South Africa;
  - c) the responsibility of being impartial, performing its functions without fear, favour or prejudice and function without any external interference.

## **SABC's SUBMISSION**



#### REVIEW OF REGULATIONS AND LEGISLATION - THE MUST CARRY REGULATIONS

- ☐ The SABC has noted that in clause 6.5.8 of the Draft Findings Document the Authority intends to review the Must Carry Regulations.
- ☐ Furthermore, the SABC notes that the Audio and Audio-Visual Content Services Draft White Paper of 2020 proposes the removal of must carry obligations.
- ☐ The Must Carry Regulations in its existing form perpetuates unfair competition between broadcasters.
- ☐ This is a direct result of the regulations making it compulsory for a subscription broadcaster to televise premium content and sports events acquired through public funding on its own platform.
- ☐ The anomaly created by these regulations, the facts being that subscription broadcasters unduly benefit for the reasons outlined, whilst the SABC is deprived of the opportunity to fully monetise and exploit its content.
- ☐ The regulations give away SABC competitive advantage by ensuring that pay-tv has access to SABC content without paying for such access. The same is not true for rights acquired by pay-tv in terms of movies and sport content.

## REVIEW OF REGULATIONS AND LEGISLATION – THE DIGITAL MIGRATION REGULATIONS & POLICY

- ☐ The ECA enjoins the Authority to protect the viability of public broadcasting services.
- ☐ The regulatory environment should enable the SABC to be financially sustainable and simultaneously deliver on its public service mandate.
- □ SABC's concern about the Digital Migration Policy is that it provides limited flexibility for the SABC as it is restricted to 84% DTT and 16% DTH capacity split respectively.
- ☐ There are substantial benefits that should the derived from DTH technology, however the SABC may be prohibited by the policy in its existing form.
- □ SABC advances that the "use it or lose it" principle on spectrum should be removed as this may also result in a punitive measure

# REVIEW OF REGULATIONS AND LEGISLATION – THE DIGITAL MIGRATION REGULATIONS & POLICY (cont.)

- ☐ Financial constraints have not been factored into the process of spectrum management.
- □ Complex planning and resultant financial investment may result in unavoidable delays. The SABC submits that allocated spectrum should not be lost in order to provide a high quality, widely available broadcasting public service channel (or channels).
- □ SABC submitted that the channel authorisation process must form a standard process for all broadcasters.
- □ SABC has called for a standard procedure for all TV broadcasters in order to further promote fair competition within the sector.

## REVIEW OF REGULATIONS AND LEGISLATION – THE DIGITAL MIGRATION REGULATIONS & POLICY (cont.)

- Regulation 10(1)(b) of the Regulations demands that ECNS licensees appointed to provide signal distribution services to the SABC must ensure that the digital broadcast signal for the SABC's DTT services reaches ninety-five per cent (95%) of the population of the Republic by the end of the dual illumination period".
- The SABC currently has 182 DTT transmitters reaching a population coverage of 87%. The BDM (Broadcast Digital Migration) Policy requirements have been achieved, but at a very high and unsustainable operational cost to the Corporation and it will also be impractical to achieve the 95% population coverage stipulations of the Regulations.
- ☐ Essentially there is no alignment between the Policy and Regulations in so far as the population coverages are concerned.

## REVIEW OF REGULATIONS AND LEGISLATION – SPORTS BROADCASTING REGULATIONS

- ☐ In addition the SABC participated in the public hearings process of the review of Sports Regulations. A summary of the key issues identified by the SABC include
  - (a) SABC calls for the unbundling of sports rights (with the resultant effect that rights owners distinguish packages between FTA's/SBS/Digital Services
  - (b) Exclusivity in respect of the category of rights and the platform per licensed service;
  - (c) Consideration of the capacity to broadcast all rights in view of a multiplatform/multichannel environment

## REVIEW OF REGULATIONS AND LEGISLATION – SPORTS BROADCASTING REGULATIONS (cont.)

- (d) Accessibility of sports rights by the FTA broadcasters for the benefit of all South Africans, irrespective of economic status;
- (e) A fair and transparent sub-licensing framework;
- (f) Exclusive funding/ring-fenced funding for sports content, which is required for the SABC to carry out its sports broadcasting mandate.

## **REVIEW OF REGULATIONS AND LEGISLATION – ADVERTISING REVENUE (SBS)**

- ☐ In the previous submissions to the Authority, the SABC had submitted that section 60 (4) of the ECA should be amended.
- ☐ Central to the arguments put forward was that advertising and sponsorship revenue should be capped for subscription broadcasters in order to foster financial sustainability of FTA services .
- ☐ The SABC notes that the Audio and Audio-Visual Content Services Draft White Paper of 2020 proposes an inquiry into (1) whether the current share of advertising revenue by SBS/pay-tv services is appropriate, and (2) the impact of online advertising on the broadcasting sector
- $\Box$  The Authority is empowered to make recommendations to the Minister in respect of any legislative amendment in accordance with section 4(2)(a) of the ICASA Act (2000).
- ☐ The SABC therefore support the view that the Authority should urgently hold an inquiry into the review of the advertising regulations as proposed in the AAVCS Draft White Paper.

## **REVIEW OF REGULATIONS AND LEGISLATION – TV LICENCE COLLECTION**

☐ The SABC noted proposals on tv licence collection however, it maintains that the matter could be effectively dealt with in the AAVCS Draft White Paper process.

#### **IMPACT OF OTT ON BROADCASTING SERVICES**

- ☐ The SABC submits that the impact of OTTs should not be taken lightly.
- The Authority found that OTTs are; (a) neither part of the subscription broadcasting, nor (b) that they do not constitute a form of potential competition for broadcasting services.
- ☐ The SABC however is of the view that OTTs are rapidly changing how content is consumed and offer an alternative for the consumption of premium content (local content).
- ☐ This effect has implications for competition for content providers, regardless of the platform of broadcasting. Ultimately, all content providers compete for audience "eyeballs" and advertising revenue.
- □ OTT platforms are driving take up by producing local content tantamount to them competing with existing incumbents. They compete for creative concepts and available production capacity (studio., staff, funding, etc.). They also have no restriction on spectrum and access
- Fortunately, the AAVCS Draft White Paper of 2020 begins to address the unregulated **25** players (OCS and VSPs) with the view to level the playing field.

#### IMPACT OF OTT ON BROADCASTING SERVICES

- ☐ While OTT subscription numbers are hard to find, some like Statista.com for instance, estimate there to be 338,000 subscribers to Netflix in 2020.
- ☐ This is over 4 times the last estimates collected using face-to-face surveying that ended in December 2019 and could not resume due to lockdown regulations.
- ☐ This growth is confirmed by the rapid rise in OTT's share of screen activity over the past 5 fiscals, assuming that the two almost equal components of TAMS's "Other" category grew at the same rate.

	Share of TV Ratings 05h00-23h00 (Mon-Sun)			
	SABC FTA TV	e.tv (Incl OVHD)	DStv	"Other"
FY 2016/17	46.4	17.6	26.9	9.1
FY 2020/21 YTD	27.2	21.0	34.4	17.4
<b>CAGR per Fiscal</b>	-12%	5%	6%	23%

Source: BRC TAMS up to 31 December 2020

It also consists of non-broadcast video activity like gaming and SVOD services (9% in Week 47 Nov 2020)

<sup>&</sup>quot;Other" consists of channels that have chosen NOT to be measured (8% in Week 47 Nov 2020)

## **IMPACT OF OTT ON BROADCASTING SERVICES (cont.)**

- □ Note the findings of the Competition Commission Data Services Inquiry (April 2019).
- ☐ Research indicates that existing international comparisons on mobile prepaid data prices collectively indicated that SA performs poorly relative to other countries.
- ☐ Lack of spectrum and cost facilities access drives up the cost of data.
- □ Should the barriers that OTTs face, such as limited levels of internet access and lowered costs of data, OTTs will make inroads that may result in them leapfrogging regulatory development.
- ☐ The COVID -19 pandemic has shown an increase in online content consumption.
- ☐ Thus, the sustainability of existing operators in the broadcasting sector amidst the OTT disruptions should be intently considered. 27

#### PREMIUM vs. NON-PREMIUM CONTENT

- ☐ The SABC agrees with the Authority that premium content is "fluid" and "dependent on a number of factors, including; culture, language, geography, live or non-live and first window or other window"
- ☐ Therefore the SABC supports and agrees with the Authority to coin the definition of premium content in line with the following findings:
- ☐ The Draft Findings also outline the following as examples of programming regarded as premium content:
  - (a) Hollywood premium First Subscription Pay TV Window (FSTW) movies and series;
  - (b) Major live soccer matches; e.g. Bafana Bafana internationals, PSL, UEFA etc.

## PREMIUM vs. NON-PREMIUM CONTENT (cont.)

- (c) Live rugby matches; e.g. Springbok international games, the Rugby Championship, IRB World Cup, Super Rugby etc.
- (d) Live cricket matches; Protea international matches including Tests, ODIs and T20s.
- □ Needless to say, the essence of premium content serves as a primary means of differentiation among broadcasting services.
- ☐ Premium content has the ability to attract high audiences and drive subscription and advertising investment and therefore has resulted in creating unrivalled dominance for MultiChoice in the SBS market.

## PREMIUM vs. NON-PREMIUM CONTENT (cont.)

- ☐ In addition, MultiChoice has through the Must Carry Regulations been "awarded" with the ability to broadcast SABC TV Channels with no payment by subscription broadcaster required.
- ☐ This has inadvertently contributed to barriers to entry, not only for the SABC but other potential commercial entrants given the restrictions in the regulations such as the number of channels required for subscription broadcasters to PBS channels.
- ☐ Given the already existing inequalities in SA, premium content should be accessible to all citizens, irrespective of their economic status.

## IMPOSITION OF LICENSE CONDITIONS – A LICENSEE WITH SIGNIFICANT MARKET POWER

- □ SABC is agreeable with the Competition Commission: a multifaceted regulatory intervention is urgently required to resolve existing regulatory bottlenecks.
- $\square$  Many layers of barriers to entry inhibits competition in the broadcasting sector.
- ☐ Current regulations are now obsolete to resolve the existing disparities.
- ☐ To emphasize, between the years 2007 2012 the Authority had licensed several SBS licensees however they have not made any mark in the market.

Super 5 Media	Walking-on Water TV
Close-T Broadcasting Network	Kagiso TV
Mindset Media Enterprises	Siyaya Free-To-Air TV
Mobile TV	

## IMPOSITION OF LICENSE CONDITIONS – A LICENSEE OF SIGNIFICANT MARKET POWER

- ☐ The majority of these licensees were not able to launch as a result of barriers to entry in the pay tv / subscription broadcasting market.
- ☐ Thus, the SABC supports the proposed licence conditions which could be imposed on a licensee with significant market power.

## IMPOSITION OF LICENSE CONDITIONS – LIMITING ACCESS TO THE NUMBER OF HOLLYWOOD STUDIOS

- ☐ We acknowledge the Authority's consideration of limiting access to the number of Hollywood studios that a Licensee with significant market power can enter into on exclusive agreements.
- ☐ The SABC's view is that this will not in itself suffice, as the matter of inaccessibility to premium movies will not be resolved.
- □ SABC submits that prospective regulations should seek to narrow the "window period".
- ☐ Broadcasters will then be in a position to extract meaningful commercial benefits from a revised window period.
- ☐ Thus, it is submitted that broadcasters should be able to access premium movies within 12 months.

#### IMPOSITION OF LICENSE CONDITIONS – SHORTEN EXCLUSIVE CONTRACTS

□ SABC submits that regarding the wholesale market for the supply and acquisition of premium content for distribution in SA –

Imposing license conditions translating into a reduction of exclusive contracts from 5-years to 3-years may not be the most effective solution to the "window period" concept.

- □ SABC's recommendation is that the term should be shortened to 6-months or less before premium content is made available to competitors to a given license holder.
- ☐ Thus, a flexible and practical approach should be sought to ensure that premium content is made available to competitors within which it is still viable for commercial exploitation.

## IMPOSITION OF LICENSE CONDITIONS – LIMITING ACCESS TO THE NUMBER OF HOLLYWOOD STUDIOS (cont.)

- ☐ Furthermore, so-called "evergreen" contracts with automatic renewals must be prohibited on exclusive contracts.
- ☐ Prohibition should not necessarily extend to exclusion of the right of first refusal and first options of renewal.
- ☐ These options serve to give premium content rights holders an unfair advantage over competing broadcasters interested in the most sought after properties.

#### **IMPOSITION OF LICENSE CONDITIONS – UNBUNDLING OF RIGHTS**

- ☐ Specific to the Sports Rights Regulations, the SABC supports the Authority's findings and intention to unbundling sports rights.
- The SABC in this regard makes the following submissions
  - (a) FTAs should be allowed to buy full rights from a subscription broadcaster and be permitted to opt for certain packages. Subscription broadcasters should be obligated to sell packages to FTAs at reasonable rates.
  - (b) The ICASA Sports Broadcasting Regulations should require broadcasters to acquire rights (local and international) for only the licensed platforms. (
    Rights holders should directly offer FTAs packages not leave it to pay-tv operators)

## **IMPOSITION OF LICENSE CONDITIONS – UNBUNDLING OF RIGHTS**

c) The lack of unbundling of rights enables MultiChoice to overcharge for substandard FTA packages, as FTAs have no recourse to do deals directly with the leagues or federations. Essentially, MultiChoice can pay a Premium for these rights and then act as gatekeeper on the distribution of these rights across all platforms.

d) It is international practice to include livestream simulcast rights regardless of whether one acquires a Free To Air or a Pay TV package. This is because most broadcasters these days have their channels carried on streaming platforms as well as their analogue/digital terrestrial distribution platforms.

## **IMPOSITION OF LICENSE CONDITIONS – UNBUNDLING OF RIGHTS**

e) In SA, MultiChoice withholds livestream simulcast rights and as a result disables ordinary South African from accessing FTA sports content on devices other than their TV sets. It means that ordinary South African can't access this content on their phone or laptops, as millions more are increasingly likely to want to do these days.

f) Rights need to be apportioned and made available only to those that have the means to distribute them in a particular mode. So, FTA rights to FTA broadcasters only, radio rights to broadcasters with radio platforms only, Pay TV rights to Pay TV broadcasters only – and livestreamed simulcast rights to all broadcasters who also have their channels carried on OTT/online services – i.e. all broadcasters.

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## RESPONSE TO SUBMISSIONS BY OTHER STAKEHOLDERS



#### $\square$ PSL

Prior to 2007, the PSL was obliged to sell its content to the SABC – there was no competitive bidding process in place; the SABC had exclusive rights to all of the PSL's content. Although the SABC sub-licensed some of these rights, its exclusive entitlement to the content from the PSL meant that the PSL had to accept a sub-optimal price for its content that did not reflect the commercial value of these rights. In an attempt to remedy this situation, the PSL developed a tender process through which it invited various parties, including broadcasters, to bid for the rights. The SABC failed to bid and the rights were ultimately awarded to SuperSport.

## **SABC Response:**

The submits that as long as the issue of unbundling of rights is not resolved, the FTAs will perpetually be subjected to "winner takes all" in the bidding process. It does not assist both the FTA broadcaster and the poor people.

#### $\square$ PSL

SuperSport has in the recent past sub-licensed 140 matches per season to the SABC, which remain available for the SABC to acquire. These include 90 ABSA Premiership league matches and 29 cup tournament matches. Included in these fixtures are 45 "shared matches", which the PSL has identified as major fixtures and which must be shown by both SuperSport and the SABC. These matches include all fixtures between the PSL's most popular clubs: Kaizer Chiefs, Mamelodi Sundowns and Orlando Pirates. In addition, 15 National First Division league matches and 6 National First Division play-off matches are also made available to the SABC. This is considerably more than the amount of PSL matches previously broadcast by the SABC prior to the PSL adopting a competitive tender process in 2007.

## **SABC Response:**

The SABC submits that the high pricing and lack of unbundling of the rights remains an impediment for accessibility of these rights. Thus, regulatory intervention is required in order to ensure that sports are not exclusively accessed by subscription broadcasters.

#### ☐ FIFA

For the 2018 FIFA World Cup, FIFA's free to air broadcast partner, SABC, was able to deliver an exceptional free to air broadcast platform for fans, including:

- 1. 44 matches shown live and in full on free to air (70% of the total number of matches);
- 2. average live audience per match 2.4 million;
- 3. highest live audience 4.6 million (the final);
- 4. 64% of the total audience came from linear free to air TV consumption; and
- 5. highlights of every match were broadcast free to air.

## **☐** SABC Response:

FIFA's submission validates the argument by the SABC on unbundling of rights as it ensures that matches are accessible to FTAs and the majority of audiences. Thus, it is in the public interest to ensure that regulatory frameworks permit a wider accessibility of listed sporting events.

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#### □ LaLIGA

The acquisition of PSL's audiovisual rights by SABC only in South Africa amounted to R72M per season13 whereas that figure is only close to the value of LaLiga's media rights in a large number of Sub-Saharan African countries altogether.

## **SABC Response:**

Laliga's assertion confirms the argument on high and unreasonable pricing of rights and sublicensing in South Africa

#### **□** MultiChoice

This phenomenon is not limited to Pay TV but also has a significant impact on how FTA is consumed. Catch-up services of FTA broadcasters are also enormously popular in SA, enabling viewers to view content on-demand. YouTube has been used extensively for catch-up services by FTA viewers, On average, a full episode of Generations on the SABC YouTube page generated 141 000 views.

## **SABC Response:**

All SABC Content on You Tube is has not been exclusive to the platform. It has been available on its FTA platform

#### **□** MULTICHOICE

- Viu SA announced partnerships with e.tv (actively marketing the fact that it carries the English Premier League FTA football package which OpenView HD has acquired) and SABC, gaining exclusive digital rights to selected SABC titles and library content (which Viu refers to as "premium" library content)
- MultiChoice's research suggests that in just the four months since its launch, the Viu app has been downloaded more than I million times in South Africa.

# **□** Response

There is no exclusivity to SABC content but additional platforms enhances access.

Thus, the SABC content remains freely accessible to all.

# **Conclusion**



#### **CONCLUSION**

- ☐ SABC would like to thank the Authority for the opportunity to comment on the Draft Findings Document and be part of the process.
- ☐ The process should consider all competition issues raised by the SABC in the Inquiry on competition within the Subscription television market, notably the review of critical regulations such as Must-Carry and sports Regulations
- □ SABC trusts that the outcome will result in speedy regulatory interventions, levelling the playing field for the benefit of the South African citizenry, especially the previously disadvantaged majority.

# THANK YOU (Q & A)

