



**Policy and Regulatory Affairs**  
**Radio Park Henley Road**  
**Auckland Park 2092**  
**Johannesburg**  
**Private Bag XI**  
**Auckland Park 2006**  
**Tel 2711 714 2759/ 3927|| Fax 2711 714 4508**  
**Email: [monyelanj@sabc.co.za](mailto:monyelanj@sabc.co.za)**

**16 April 2018**

**Attention: Ms Fikile Hlongwane**

Senior Manager: Broadcasting Licensing Division  
Independent Communications Authority of South Africa  
164 Katherine Street  
Block A  
Sandton  
2146

**CC: MR AMOS MUHULATSI: FREE TO AIR TV (PTY) LTD**

**Email: [FHlongwane@icasa.org.za](mailto:FHlongwane@icasa.org.za)**

**Cc: [centralcraftmedia@gmail.com](mailto:centralcraftmedia@gmail.com)**

Dear Ms Hlongwane

**RE: INVITATION TO APPLY FOR INDIVIDUAL COMMERCIAL TELEVISION  
BROADCASTING SERVICE AND RADIO SPECTRUM LICENCE FOR MUX 3  
FREQUENCIES**

The SABC hereby wishes to register its objection to the licensing of new players to be assigned frequencies on Mux 3 during the dual illumination period which may hamper the seamless migration of the incumbent broadcasters to DTT. Over the years, the SABC has submitted several representations to the Authority in which it requested the Authority to introduce new players/licensees post the dual illumination period. This view is premised on the following reasons:

- New players will not incur migration costs nor experience fragmentation of audiences, instead their novelty can attract more audiences shared from incumbent broadcasters

including the public broadcaster whose viability and integrity must be protected by the Authority given its role in the society;

- The existing players will have to seek alternative revenue sources as the advertising pie will not increase but shrink;
- The existing broadcasters have to migrate for the national good and interest as the digital dividend will benefit the entire country; this is a massive inconvenience to existing broadcasters and the Authority has a responsibility to ensure the viability of existing broadcasting services licensees before any new licenses are issued; and
- International precedent shows that all developed countries did not introduce competition during the dual illumination period with the intention to offer incumbent broadcasters a smooth landing onto digital platform. Various governments have thrown their weight behind broadcasters, particularly public broadcasters by putting resources, communication and enabling policy frameworks<sup>1</sup>.

Based on the above-mentioned reasons, the SABC respectfully requests that the Authority to consider introducing new licensees post the dual illumination period in order to foster a smooth digital migration for existing broadcasters.

The SABC also wishes to indicate that it will not be participating in the public hearings of this inquiry.

Yours Sincerely



**Fikile Skosana**  
**General Manager (Acting)**  
**Policy and Regulatory Affairs**

---

<sup>1</sup> [https://en.wikipedia.org/wiki/Digital\\_television\\_transition](https://en.wikipedia.org/wiki/Digital_television_transition)