



Policy and Regulatory Affairs
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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 ZOLILE NTUKWANA
MR BEN AMADASUN: KWESE FREE TV (PTY) LTD

Email: FHlongwane@icasa.org.za

Cc: Zolile@econetmedia.com | Ben@econetmedia.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 frameworks¹.

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

¹ https://en.wikipedia.org/wiki/Digital_television_transition