

Vision View Sports Radio CC



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VISION VIEW SPORTS RADIO SUBMISSION TO ICASA ON DRAFT NATIONAL RADIO FREQUENCY PLAN 2021



1. INTRODUCTION

1.1 **Vision View Sports Radio** South Africa's premier 24 hour online radio station that offers sport entertainment, it was launched in January 2018. We have carved a unique captive market that is informed, passionate about sport and tech savvy.

With a national and international footprint, we are the first and only exclusive sports radio station in Africa, with vibrant programming that is dedicated to sport news, talk radio, music as well as general lifestyle content that is defined by present day trendsetters, opinion shapers and decision makers.

Boasting South Africa's prominent sports presenters and former professional sports stars, Vision View Sport Radio is definitely a cut above the rest when it comes to sport radio programming. We currently employ 30 full time staff members.

1.2 **Vision View Sports Radio** welcomes the opportunity to make representations and supports the Authority's plan to regularly update the National Radio Frequency Plan in order to ensure efficient spectrum management.

1.3 **Vision View Sports Radio** which is **without** a sound broadcasting license, will confine its submission on this draft plan to sections relevant to our business, and will welcome the opportunity to make an oral submission to substantiate on our representations.

2. COMMENTS ON THE DRAFT NRFP 2021

The only relevant section of the draft plan for our business is aptly captured in the National Table of Frequency Allocations.

87.5-100 MHz BROADCASTING 5.190	87.5-100 MHz BROADCASTING	FM Sound Broadcasting (87.5-108 MHz) Digital sound broadcasting (DSB)	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Geneva agreement GE84 Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021
100-108 MHz BROADCASTING 5.192 5.194	100-108 MHz BROADCASTING	FM Sound Broadcasting (87.5-108 MHz) Digital sound broadcasting (DSB)	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Geneva agreement GE84 Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021

This table no doubt confirms the scarcity of radio spectrum therefore, spectrally efficient standards like Digital Sound Broadcasting should be pursued not only to migrate existing sound broadcast

licensees but to provide for the “**granting of licenses and new social obligations**” to new entrants as well, the Electronic Communications Act of 2005 (Act no 36 of 2005) declares this in its opening paragraph.

- 2.1 **Vision View Sports Radio** submits that the limitations imposed by the depleted radio spectrum to for new entrants into the market; the Authority should reconsider **Regulation 4(3)** of the **Digital Sound Broadcasting Services 2021** and revise the period to consider applicants without existing sound broadcasting licenses from 3 years to 12 months.
- 2.2 **Regulation 4(3)** of the **Digital Sound Broadcasting Services 2021** is not helpful and represents an **opportunity cost** in terms of healthy market competition, meeting the demand for new licenses, job creation, National economic recovery plan and championing the 4th Industrial Revolution. The country is already decades late where digital migration is concerned and we contend that it cannot be business as usual.
- 2.2.1 By waiting for 3 years before issuing an ITA for new entrants it consolidates the market positioning of existing sound broadcasting licensees thereby creating an environment of unfair competitive behaviour. Sentech alluded to same in their submission to the draft regulations.
- 2.2.2 New entrants, especially in the commercial tier could see much needed jobs created and new niche broadcasting markets created.
- 2.2.3 Economic recovery from the Covid-19 pandemic could be aided by investments brought by new entrants with a demonstrable track record and predetermined financial viability. To mitigate against the current cost of DSB receivers and cost of signal distribution, the more market offering you have might just help the uptake of the DSB service. The existing licensees do not have to develop the market on their own.
- 2.3 We have premised our submission on **Chapter 5 of the Electronic Communications Act 2005, Section 34, subsection**
(6) The national radio frequency plan must—
*(e) provide for **flexibility and the rapid and efficient introduction of new technologies**;*
*(f) aim at providing **opportunities for the introduction of the widest range of services and the maximum number of users thereof as is practically feasible.***
- 2.4 Vision View Sports Radio would through the oral submission relish the opportunity to make a case for license conditions that may speak to special interest areas, currently not covered by the existing community or commercial license holders such as 24 hour sport programming. We are keen to share with the commissioners our 3 year

experience and demonstrate the market uptake from such a non-traditional route notwithstanding data costs challenges.

3. CONCLUSION

Vision View Production is pleased to be afforded the opportunity to make these representations in the hope that, if space is not created for new entrants by exploiting the potential use of DSB then the Authority has to reconcile how they are going to repurpose or rationalize the current spectrum assignment and offer opportunities to South Africans previously disadvantaged otherwise it leads to a conclusion that the status quo will always empower those already benefitting. This will enrich the current offering to our diverse national and dynamic population whilst addressing socio-economic issues that have dogged the country in the recent past and stalled economic growth potential in the sector.

Thabang Edwin Ketshabile

Send via email

