

Independent Communications Authority of South Africa  
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27 February 2026

Dear Sirs

**RE: EMEDIA'S SUBMISSION ON THE DRAFT SIGNAL DISTRIBUTION SERVICES REGULATIONS, 2025**

**Introduction**

1. eMedia Investments (Pty) Ltd ("**eMedia**") thanks for the Authority for the opportunity to make submissions in relation to the Draft Signal Distribution Services Regulations, 2026 published in GG53966 on 16 January 2026 ("**the 2026 Draft Regulations**").
2. eMedia is the holding company of e.tv, a "*terrestrial signal distribution television broadcasting service*" and YFM, a "*terrestrial signal distribution FM sound broadcasting service*". It therefore has a direct interest in the final regulations and RO.
3. eMedia requests the opportunity to participate in any oral hearings held in relation to the 2026 Draft Regulations.
4. eMedia has participated consistently in every phase of the Authority's attempts to regulate the signal distribution services market since 2010. eMedia notes that the 2026 Draft Regulations are described by the Authority, in the Explanatory Memorandum, as a "second draft", following consideration of written and oral representations on the first draft published in 2025 (GG 52622 of 8 May 2025). The Authority has expressly invited stakeholders to focus on revised provisions in Regulations 8, 9 and 10.

5. eMedia supports the Authority's confirmation that: (i) competition in the relevant wholesale terrestrial signal distribution markets is ineffectively competitive; and (ii) Sentech SOC Ltd ("Sentech") has Significant Market Power ("SMP") in all such markets; and (iii) the continuing intention to impose ex ante pro-competitive licence conditions in accordance with section 67(4) of the Electronic Communications Act, 2005 (Act 36 of 2005) ("ECA").
6. eMedia welcomes the Authority's rejection of Sentech's recent attempt to redefine the market more broadly to include satellite and IP-based alternatives and the fact that the Authority has confined the market to wholesale terrestrial signal distribution.

### General comments

7. eMedia has two overarching concerns which permeate the entirety of the 2026 Draft Regulations. These are:
  - 7.1 the lack of clarity as to the meaning of Reference Offer ("RO"); and
  - 7.2 the lack of *audi alteram partem* which is crucial to the finalisation of the RO to ensure pro-competitive terms and conditions and to comment on any review of the market as provided for in Regulation 10 of the 2026 Draft Regulations. eMedia deals with each of these in turn.

### Audi alteram partem / the right to be heard

8. Section 33 of the Constitution of the Republic of South Africa, 1996, provides in section 33(1) that:
 

*"Everyone has the right to administrative action that is lawful, reasonable and procedurally fair"*.
9. The Constitution further provides that it is necessary to have national legislation to give effect to the rights contained in section 33 of the Constitution. Further, section 33(3)(b) imposes a duty on the State to give effect to the rights contained in section 33 including the right to administrative action that is lawful, reasonable and procedurally fair. ICASA falls within the definition of the State.

10. To give effect to section 33 of the Constitution, the Promotion of Administrative Justice Act 3 of 2000 (“**PAJA**”) was promulgated.
11. The following sections of PAJA bear relevance:
  - 11.1 “**administrative action**” is defined in section 1 and includes any decision taken by an organ of state when, *inter alia*, “exercising a public power or performing a public function, in terms of any legislation”. In promulgating the Regulations, ICASA is exercising a public power.
  - 11.2 “**decision**” is defined in section 1. A decision of an administrative nature including a decision relating to “(d) *imposing a condition or restriction*”. By adopting an RO as presented by Sentech, which will be binding on all licensees reliant on the terrestrial network, ICASA will be imposing such conditions or restrictions and will do so in terms of the ICASA Act – being the empowering provision. In essence, the RO will constitute an agreement between Sentech and each individual broadcast licensee. Such contractual terms cannot merely be unilaterally imposed on a party without such party being able to participate in the process.
  - 11.3 ICASA is deemed to be an organ of state by reason of the definition of “organ of state” in section 239 of the Constitution. Organ of state is widely defined to mean not only a department of state but also “*any other functionary or institution*” – exercising a power or performing a function in terms of the Constitution or a provincial constitution, or exercising a public power or performing a public function in terms of any legislation. ICASA is the broadcasting authority established and existing in terms of section 192 of the Constitution created for purposes of regulating, *inter alia*, “broadcasting in the public interest ...”
  - 11.4 Section 3 of PAJA deals with “*procedurally fair administrative action affecting any person*”. Section 3(1) provides as follows:

“Administrative action which materially and adversely affects the rights or legitimate expectations of any person must be procedurally fair”.
  - 11.5 It brooks no doubt that the promulgation of regulations of any nature, including the 2026 Draft Regulations, falls within the definition of administrative action which

materially and/or adversely affects the rights of broadcasting using the terrestrial network. We refer to what is set out more fully in this regard in paragraph 11.2 above.

- 11.6 The section further provides that procedurally fair action depends on the circumstances of each case which includes, amongst others, “*a reasonable opportunity to make representations*” (see section 3(4)(ii) of PAJA). While there may be exceptions to these obligations, there are no circumstances in the current instance which would permit ICASA to depart from any of the aforesaid requirements. A departure would not be reasonable or justifiable and, in circumstances where attempts to regulate the radio transmission services market has been ongoing for years, there can be no requirement that the administrative action is taken urgently as provided for in PAJA, albeit that eMedia requests that the matter proceeds from hereon in according to strict timelines.
- 11.7 Section 4 of PAJA deals with “*administrative action affecting the public*”. The impact of the promulgation of the 2026 Draft Regulations will clearly affect members of the public – not only the providers of broadcasting services that those reliant on such broadcasting services. In these circumstances an administrator, to give effect to the right of procedurally fair administrative action, “*must decide whether – (a) to hold a public inquiry ...; (b) to follow a notice and comment procedure ...; (c) to follow the procedures in both subsections (2) [public inquiries] and (3) [a notice and comment procedure].*”
12. There are clearly defined procedures when an administrator, of which ICASA is one, holds a public enquiry or engages in a notice and comment procedure.
13. The 2026 Draft Regulations, which clearly fall within the ambit of PAJA by unilaterally imposing terms and conditions on broadcasters which may fundamentally affect their rights in numerous ways, including price, needs to follow a fair procedure either in the form of a public inquiry or a notice and comment procedure, or both, backed up, in either instance, by providing reasons for its decision which, in terms of PAJA, would also be subject to judicial review.
14. Equally important is that the obligation to follow a fair procedure as outlined in both the Constitution and PAJA is reflected in the ECA. Section 4 of the ECA deals with the manner in which the Authority makes regulations “*with regard to any matter which in terms of this Act or the*

*related legislation must or may be prescribed*". The 2026 Draft Regulations accordingly fall within this category. Section 4(4) importantly provides as follows:

*"The Authority must, not less than thirty (30) days before any regulation is made, publish such regulation in the Gazette, together with a notice*

*(a) ...; and*

*(b) inviting interested parties to make written representations on the regulations."*

15. eMedia appreciates that the process currently being followed is in respect of ICASA's intention to convert the 2026 Draft Regulations into Regulations and that the RO, which it ultimately needs to approve does not constitute regulations per se. However, the RO is akin to regulations, if not more onerous given that it is contractually binding on licensees, and the terms and conditions contained in the RO will impose both rights and duties on broadcasters utilising Sentech's services in a dominant market.
16. Taking the above into consideration, eMedia suggests that Regulation 8 of the 2026 Draft Regulations which deals with pro-competitive terms and conditions should be amended in part. Accordingly, Regulation 8(c) should be amended as follows:

*"(c) Publication of ROs :*

- (i) within ten (10) days of Sentech submitting an RO pursuant to regulation 8(b)(i), the Authority must publish the ROs for public comment in the Gazette;*
- (ii) the public comment procedure shall be conducted on an expedited basis as follows:*
- (1) any party wishing to comment on the RO shall do so in writing within three weeks of the publication of the RO;*
- (2) should the Authority decide to conduct a public hearing in respect of the RO, such public hearing shall take place within four weeks of the closure of the public comment procedure; and*
- (3) the Authority shall make a decision in relation to the RO, containing any amendments thereto which the Authority decides are necessary pursuant to the procedure outlined above within 45 days of the conclusion of the hearings and will publish the RO together with reasons for its decision in the Gazette;*
- (iii) Sentech must publish the approved ROs on its website within fourteen (14) days after approval by the Authority.";* and
- (iv) the RO will become effective upon approval by the Authority and publication on Sentech's website.;*

17. It is also necessary to include a fair administrative procedure when reviewing the markets as provided for in Regulation 10 of the 2026 Draft Regulations. This is irrespective of whether the markets are reviewed when the Authority deems it necessary, after three or after five years from the date of implementation of these Regulations. The 2026 Draft Regulations, while providing for a review of the markets to which these regulations apply, makes no provision for a review of the RO.
18. It is accordingly suggested that Regulation 10 be amended to read as follows:

***“10. SCHEDULE FOR REVIEW OF MARKETS, THE RO AND PRICES TO BE CHARGED BY SENTECH FOR THE UTILISATION OF ITS SERVICES***

- (1) The Authority will review the markets, to which the regulations apply, when the Authority deems it necessary or after five (5) years from the date of publication of the RO on Sentech’s website.*
- (2) Pending the outcome of any review conducted pursuant to this regulation, the existing RO shall remain in full force and effect.*
- (3) In conducting the review the Authority shall follow the procedure set out in regulation 8© above.*
- (4) Sentech or any other party utilising Sentech’s terrestrial network may, in writing, request the Authority to review the terms and conditions set out in the RO and provide written reasons for such request. The Authority will consider such request and, if it deems it necessary, will engage in a review of the RO and, in doing so, shall follow the procedure set out in regulation 8(C) above.*
- (5) The schedule of charges for signal distribution services as contained in the RO shall be binding on any broadcaster using Sentech for its signal distribution services for a period of two years from the date of the publication of the RO or any amendment to the charges which Sentech can charge for the distribution of its signal distribution services.*
- (6) Where Sentech is able to show that special circumstances exist which may require it to increase the schedule of its charges for signal distribution services, it shall send such request to the Authority together with full written reasons underpinning the request taking into account the provisions of the regulations including appendix ‘A’. Should the Authority believe there may be good cause for a change in the schedule of charges, it shall follow the procedures contained in section 4 of the ECA as well as those outlined in Regulation ... above before it makes any decision in relation to whether the charges for signal distribution services should be amended. The amended charges shall take effect upon publication on Sentech’s website.*

- (7) *Any changes to the charges for signal distribution services shall come into effect sixth (60) days after publication of the changed charges in the Gazette.*
- (8) *Any party utilising the services of Sentech, pursuant to the RO, may in writing supported by detailed reasons, request the Authority to consider such party's request to amend any one or more provisions in the RO following the procedure outlined in this regulation and regulation 8(C)."*

## Reference offer

19. There is a confusion as to what is meant by an RO. An RO is defined, in section 1 of the 2026 Draft Regulations as meaning “*a document setting out the standard terms and conditions for terrestrial signal distribution broadcasting services agreements*”. This has to be done in respect of each of the markets contemplated in the 2026 Draft Regulations being FM and AM sound broadcasting services and television broadcasting services.
20. Confusion arises from the 2026 Draft Regulations as to whether the RO, once published, consists of a binding agreement on all Sentech's customers and will include all terms governing their relationship, including all those relating to prices to be charged in respect of the signal distribution services provided, or whether it is contemplated that the RO contains certain terms and conditions and that others, such as price, are governed by an agreement.
21. It is submitted that the RO is a document which should contain all the terms and conditions and there should be no separate agreements between Sentech and broadcasters. Reference is made in the dispute resolution clause to an RO being concluded by a broadcaster and Sentech. This cannot be so. This therefore needs to be clarified.
22. The confusion arises as no specific provision is made concerning the effect of the RO which means that a broader definition of RO should be contained in the 2026 Draft Regulations.
23. If this does not happen, confusion is bound to arise between Sentech and its customers which will likely result in unnecessary litigation concerning the interpretation of the final Regulations which will, of necessity, involve ICASA as an interested party.
24. The following sections create the confusion:
- 24.1 In section 8(d) dealing with dispute resolution, subsection (i) provides that :

“Where a broadcaster and Sentech have been unable to conclude an RO, either party may refer the dispute to the Authority for resolution.”

- 24.2 This contemplates that there will be one overarching RO applicable to all broadcasters using Sentech’s signal distribution services which will be published on Sentech’s website and a further RO between Sentech and individual broadcasters. eMedia says this as the aforesaid section alludes to Sentech and individual broadcasters concluding an RO. If this was not so, this regulation would not refer to a dispute arising where individual parties and Sentech cannot conclude an RO.
- 24.3 Appendix A adds to this confusion as it uses both the terms RO and agreement - see, for example, paragraphs 2.1, 3.1, 3.2 and 7.
25. eMedia submits that the RO should contain all the terms and conditions applying to all broadcasters as to do otherwise would run contrary to the intention of the Regulations as it would mean that different terms and conditions and/or pricing could apply to different broadcasters. The RO should contain detailed provisions as to pricing in respect of each of the markets defined.
26. The RO should therefore take the form of an offer by Sentech and each licensee which sets out the terms and conditions applicable to the use of the services by the licensee. Each licensee is at liberty to accept or reject the offer on its published wording. In this regard, there is no obligation for any licensee to use Sentech’s services and, unlike in the past when e.tv was tied to an evergreen agreement, any licensee should be able to elect to terminate the agreement as contained in the RO on an agreed upon notice period. In the future, it may very well be that certain licensees may wish to self-provide.
27. So, by means of example, insofar as Telkom is concerned, it provides interconnection by means of an interconnection agreement to licensees. The front page of that offer specifically states: **“TELKOM REFERENCE INTERCONNECTION OFFER”** and specifies the nature of the agreement.
28. eMedia is willing to participate further in drafting general clauses it believes should be included into the RO and is amenable to doing so upon request.
29. By reason of the aforesaid, eMedia suggests the following redrafting:
- 29.1 The definition of “reference offer” should read as follows:

*“Reference Offer or ‘RO’ means a document setting out all the terms and conditions for the provision by Sentech to a broadcaster wishing to utilise its terrestrial signal distribution broadcasting services, which reference offer shall be binding on both the broadcaster and the broadcasting licensee utilising the aforesaid services from the date the RO is published on Sentech’s website”.*

29.2 In other words, this takes out any ambiguity as to whether any further agreements need to be concluded between Sentech and a broadcaster.

29.3 Paragraph 8(c) dealing with dispute resolution should be amended so that subsection (i) reads:

*“Where a dispute arises between Sentech and a broadcasting licensee in relation to the implementation of the RO, its interpretation or application, or an interpretation of the parties’ respective rights and obligations arising out of the RO or the termination or cancellation of the RO, either party may refer the dispute to the Authority for resolution.”*

29.4 In view of the fact that a referral to the Authority is not obligatory, eMedia would suggest that the dispute resolution clause be broadened to set out the procedure to be followed where any dispute cannot be resolved, whether directly between the parties or by mediation under the auspices of the Authority. This should be in the form of an expedited arbitration. eMedia will gladly assist in drafting such a clause.

### Specific concerns

30. eMedia is deeply concerned that, in certain respects, the 2026 Draft Regulations weaken or defer remedial measures that appeared in the 2025 draft, notably-

30.1 the removal of detailed cost-orientation criteria formerly in Regulation 8(a)(i)–(iv); and

30.2 the removal of explicit monitoring and pricing-remedy provisions formerly in Regulation 9.

31. Given the Authority’s own findings since 2011 that Sentech holds SMP in a natural monopoly market, and given the 14-year history of regulatory delay documented in eMedia’s previous submissions, eMedia submits that

- 31.1 the 2026 Draft Regulations must not dilute the already modest remedial provisions in the 2025 draft; and
- 31.2 as stated by eMedia in its previous submissions and at the hearings held in August 2025, transparency should be a key element of preparing the RO particularly when it comes to pricing. One of the issues in the past is that broadcasters were never able to understand the basis on which prices were being charged and Sentech were not forthcoming with any information in this regard. They were unrelated to costs and, in e.tv's case, the agreement was an evergreen agreement with an escalation clause. The compound effect of the escalation clause meant that e.tv was and is overpaying for the signal distribution services provided to it by Sentech. Motivations in respect of pricing should be detailed and eMedia would suggest going back to the previous formula but with greater clarity as to the meaning of direct costs, common costs and how they differ to direct costs and parameters for the limits of a return on capital employed which is commensurate with risk taken.
32. While appendix "A" provides some guidance in this regard, it too remains vague setting out, in general, not how pricing is to be calculated but the terms and conditions to be included in an RO. So, for example, paragraph 6 of appendix 'A' which deals with a schedule of charges for signal distribution services merely sets out that the relevant provisions in the ROs must deal with –
- 32.1 General financial matters;
- 32.2 Billing procedures;
- 32.3 Payment terms and conditions;
- 32.4 Wholesale rates or charges including surcharges and any escalation;
- 32.5 Mechanisms for the review of charges.
33. The whole issue of transparency relates back to the principle of *audi alteram partem*. If the Authority maintains the discretion to approve the RO without hearing from any other parties, it may create the impression of bias. The old adage : "*justice must not only be done, but must be seen to be done*" is apposite.

34. Without a transparency obligation coupled with *audi alteram partem*, the manner in which prices, direct costs and their recovery as well as the share of common costs and capital return are calculated remain meaningless.
35. Disclosure obligations should also apply to clause 9 of the 2026 Draft Regulations dealing with monitoring and investigation. Any information provided by Sentech in this regard, as a public entity, should not only be submitted to the Authority but also to licensees. Sentech's historical SMP over decades has meant that there has been no transparency in relation to pricing, notwithstanding that in the past Sentech has promised transparency. Allowing not only the Authority but also licensees access to a breakdown of information and assumptions used to support Sentech's terrestrial signal distribution tariffs will go some way to creating transparency particularly when coupled by a public process. Broadcasting licensees utilising the services of Sentech should have an absolute right to comment on tariffs and any proposed increases.
36. In clause 10 of the 2026 Draft Regulations, dealing with schedule for review of markets, a subsection (ii) should be included :

*"The existing ROs as approved by the Authority and published on Sentech's website shall continue to be binding on Sentech and all broadcasting licensees utilising Sentech's signal distribution services until the Authority has approved a new or amended RO and this has been published on Sentech's website."*

## Timing

37. In terms of this current phase of the signal distribution market inquiry which was launched in September 2021, the Authority's own timetable envisaged four phases: (1) questionnaire, (2) Discussion Document, (3) public hearings and a Findings Document within 90 days of conclusion of the inquiry.
38. In practice what happened –
- 38.1 the Discussion Document was only published in April 2022 (five months late);
- 38.2 hearings were held in August 2022;
- 38.3 contrary to section 4C(6) of the ICASA Act, no findings were published within 180 days of the conclusion of those hearings;

- 38.4 instead, in July 2023, the Authority published a Request for Further Information, and in April 2024, a Supplementary Discussion Document; and
- 38.5 only in May 2025 did the Authority publish draft Signal Distribution Services Regulations, 2025 (GG 52622). Hearings were subsequently held in August 2025 and it took from then until 16 January 2026 for the Authority to publish further Draft Regulations.
39. It is therefore suggested that if hearing are held pursuant to these submissions, they should be held no later than six weeks from the closing date for the submission of comments on the 2026 Draft Regulations. Thereafter, the August should have 60 days for the publication of the Regulations after which the time periods set out in the Regulations will apply.
40. In all of our previous submissions eMedia has supported the Authority's determination that the relevant wholesale markets are those for terrestrial signal distribution for TV and FM/AM radio; and that Sentech has SMP in those markets. eMedia has equally criticised the Authority's failure to translate those findings into binding regulations under section 67(4); and the repeated delays, which have prejudiced free-to-air broadcasters by allowing Sentech to continue charging tariffs which are opaque and untested against underlying costs; and have grown from around 14.6% of e.tv's cost base in 2011 to approximately 22% in 2026.

### **The 2025 Draft Regulations and the 2026 Draft Regulations**

41. In our submission on the 2025 draft regulations, eMedia identified some serious gaps including–
- 41.1 vagueness of “cost-based” tariffs in Regulation 8(a);
- 41.2 lack of clear definitions for cost components and cross-subsidies;
- 41.3 absence of explicit rules excluding bad debts and non-broadcast costs from the cost base;
- 41.4 limited transparency to broadcasters; and
- 41.5 absence of strict timelines for the Reference Offer (“RO”) process and for converting existing evergreen contracts.

42. eMedia supports the following core elements of the 2026 Draft Regulations:
- 42.1 the market definitions in Regulation 3, which correctly confine the relevant markets to wholesale terrestrial signal distribution (and do not conflate these with satellite or IP-based distribution);
  - 42.2 the determinations in Regulations 5 and 6 that competition in those markets is ineffectively competitive; and Sentech has SMP in each of them; and
  - 42.3 the recognition in Regulation 7 of natural monopoly characteristics due to high sunk infrastructure costs; and a lack of transparency in tariffs and service quality.
43. eMedia also welcomes, in principle, key enhancements in Regulations 8(b)–(d), notably:
- 43.1 the obligation on Sentech to submit ROs for each defined wholesale market;
  - 43.2 a firm 45-day deadline for such submissions after the Regulations take effect;
  - 43.3 the requirement that ROs comply with the minimum content specified in Appendix A;
  - 43.4 the ability of the Authority to publish ROs for public comment;
  - 43.5 the requirement that Sentech publish approved ROs; and
  - 43.6 the creation of an ICASA-administered dispute resolution mechanism.
44. However, eMedia remains seriously concerned that the 2026 Draft Regulations dilute important remedial content compared to the 2025 draft; and defer critical detail to later, non-regulatory “cost modelling” processes.
- 44.1 Regulations 8: has been narrowed from the 2025 version: the express elaboration of the cost base (direct costs, common costs, return on capital, exclusion of other services’ costs) has been removed.
  - 44.2 Regulation 9: has been stripped of specific information categories; and the explicit pricing-remedy clause that appeared in the 2025 draft.

- 44.3 Regulation 10: now extends the review period from three (3) to five (5) years, which is inconsistent with the urgency required to correct entrenched SMP-based distortions.
45. eMedia submits that the 2026 Draft Regulations should retain and strengthen, rather than weaken, the 2025 provisions on cost-based tariff principles and monitoring and pricing remedies.
46. In addition, the 2026 draft Regulations should be amended to codify Sentech's common carrier status and non-discrimination obligations and provide meaningful transitional arrangements for existing evergreen contracts and entrench transparency and time-bound public processes for both ROs and tariff modelling.
47. The 2026 Draft Regulations should convert the common-carrier concept into concrete, enforceable duties, aligned with section 62(3) of the ECA, including:
- 47.1 a duty to provide broadcasting signal distribution services to broadcasting licensees on an equitable, reasonable, non-preferential and non-discriminatory basis; and
- 47.2 an obligation to apply tariffs that are appropriate to, and commensurate with, the various broadcasting services served.
48. The 2026 draft removes the more concrete elements of the 2025 Reg 8(a) and leaves only a general reference to "efficiently incurred costs" and "return commensurate with risk". In the context of the Authority's 14-year history of delay in this area, and given Sentech's track record of claiming cost-based pricing while refusing transparency, this approach is problematic because it reduces legal certainty, making it harder to challenge tariffs as non-cost-based and it gives Sentech more room to argue for generous interpretations of "efficiently incurred costs" and "risk". It further defers key protections to a future cost model which will inevitably result in further delays.
49. In light of the above, and taking into account the comments set out herein, eMedia urges the Authority to return to the wording in Regulation 8(a) from the 2025 draft regulations subject to the points of clarity regarding definitions as further explained herein.
50. eMedia welcomes the obligation in Reg 8(b)(i) for Sentech to submit ROs for each defined wholesale market within 45 days of the Regulations taking effect; and the Authority's power in Reg 8(b)(iii) to direct amendments where ROs are inconsistent with the Regulations. However, the Regulations do not provide any timeframes to approve or reject an RO or a structured process

for public comment on an RO. This may again result in delays. These need to be specified and eMedia requests that the specified time periods are short given the prejudice which broadcasting service licensees, and certainly e.tv, have suffered as a result of Sentech's market power and dominance which ultimately compelled e.tv into entering an evergreen agreement as it had no other options. This evergreen agreement is prejudicial and has now resulted in costs for services which are out of line with actual costs.

51. The 2025 draft required Sentech to submit, upon request, detailed information and assumptions supporting its tariffs. However we are very concerned that the 2026 Draft Regulations have removed the specific categories of information and explicitly pricing remedy. This is a material weakening of the draft Regulations and runs contrary to the Authority's findings that that price controls and cost accounting obligations are necessary to remedy Sentech's SMP. eMedia submits that Regulation 9 should be restored, at minimum, to the level of detail contained in the 2025 draft.
52. eMedia believes that the draft Regulations are an important step towards reinstating effective competition in the wholesale terrestrial signal distribution market. The absence of regulations has harmed free to air broadcasters for too long.
53. eMedia thanks the Authority for the opportunity to comment on the Regulations and look forward to participating in the next stage of the process.

Yours faithfully,



Philippa Rafferty  
Group Executive: Legal and Regulatory