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EMEDIA'S INVESTMENTS ("EMEDIA")
DRAFT FREQUENCY MIGRATION PLAN
12 OCTOBER 2018



A. INTRODUCTION

1. On 24 August 2018 the Independent Communications Authority of South Africa (ICASA) published the draft frequency migration plan 2018, for public consultation. Interested persons were given until 12 October 2018 to submit their input.
2. The NAB welcomes this opportunity to make a few general comments. Although some of the issues have been raised in previous submissions, they remain pertinent to the broadcasting industry and are equally relevant to the published draft plan under consideration.
3. e.tv (Pty) Limited (“e.tv”) welcomes the opportunity to make submissions on the draft frequency plan published by ICASA. e.tv has up to date, been an active participant in all ICASA regulatory making processes.
4. e.tv (Pty) Ltd (e.tv) is a wholly-owned subsidiary of eMedia Investments (Pty) Ltd (eMedia Investments). eMedia Holdings Pty (Ltd) (eMedia Holdings) holds 67.7% of the shareholding in eMedia Investments, with Venfin Media Pty (Ltd) being the other major shareholder in the company. In turn, eMedia Holdings’ major shareholder is the JSE-listed Hosken Consolidated Investments Limited (HCI).
5. e.tv believes that there are certain trends apparent in the broadcasting sector that, unless arrested, will impact negatively on the long-term viability and sustainability of the broadcasting sector, particularly the free-to-air (“FTA”) broadcasting sector, including the public broadcaster – the South African Broadcasting Corporation (SABC).



B. eMEDIA's SUBMISSION

Paragraph 4.10.6 (174-223 MHz)

6. eMedia recommends that the limited allocation in this band for the introduction of T-DAB digital sound broadcasting, after the completion of the television digital migration be increased from two (2) MUX allotments per province to a minimum of four (4) MUX allotments. This is recommended in order to cater for all the incumbent sound broadcasting licensees, and also to cater for them introducing additional digital radio services and the expansion of their present coverage areas. Once this has taken place new digital radio stations can be licenced.

Paragraph 4.10.25 (3600-4200 MHz)

7. C-band satellite is the critical primary feed to the majority of the individual radio and television terrestrial transmitters in South Africa, and in many other countries around the world. This is due to the robust up and downlinks, which are largely immune to rain fade. As a secondary backup feed to these terrestrial radio and television transmitters KU-band has been deployed, in the event of a C-band transmission chain failure.
8. The C-band downlink receivers, receive a relatively weak signal directly from the satellite and is prone to interference from point to point and point to multipoint terrestrial telecommunication links operating in and close to the C-band frequencies.
9. It is not possible to alter the up and downlink frequencies of any particular C-band transponder. In the major cities in some countries around the world it is becoming



more and more difficult to make use of C-band satellite downlinks due to the ever increasing interference from terrestrial telecommunication wireless links.

Paragraph 4.10.36 (10700-11700 MHz)

10. Ku-band satellite as mentioned previously is the secondary feed to the majority of the terrestrial radio and television transmitters in South Africa. Ku-band satellite is growing internationally as a direct to home (DTH) television platform. The latest research done by the broadcast research council (BRC) in South Africa qualifies the fact that approximately 60% of the 14 million television households in South Africa have migrated from analogue to digital by means of a subscription or free to air (FTA) digital Ku-band satellite platform, rather than the digital terrestrial television (DTT) platform.
11. Furthermore research undertaken in Germany has found that only 5% of the television households in Germany receive television from DTT.
12. Switzerland have announced that they will be switching off the public broadcasters DTT networks in early 2019. This is due to the fact that the citizens of Switzerland have opted to make use of satellite, cable and other OTT platforms to receive television.

C. CONCLUSION

13. e.tv thanks ICASA for the opportunity to make written submission on the draft frequency migration plan.
14. We further submit that the commercial FTA broadcasting is a critical element of the South African broadcasting ecology and the Government has the duty to protect it.