

27 May 2010



mnet

To: The Parliamentary Portfolio Committee on Communications
Attention: The Honourable Mr I Vadi – Chairperson
By e-mail: ivadi@telkomsa.net
Also to: Mr Thembinkosi Terence Ngoma - Committee Secretary
E-mail: tngoma@parliament.gov.za
From: Ms Karen Willenberg

Dear Sir

Briefing Session on Digital Migration

1. We refer to the Special Information and Briefing Session on digital migration which the Committee has scheduled for 1 June 2010. Although M-Net's request to present to the Committee was declined, we do appreciate this opportunity to make a written submission.
2. As the Committee is aware, M-Net is an analogue terrestrial broadcaster and one of three existing analogue broadcasters which will be required to undertake the migration to digital. M-Net is committed to a swift and successful migration to digital for South Africa and we make a submission to the Committee in this spirit.
3. M-Net has been involved in the planning for South Africa's migration to digital since 2002. We commenced our trials of DTT in Johannesburg, Pretoria, Durban and Cape Town in 2008. To date, we have invested in excess of R40 million in this trial to prepare for a commercial launch of DTT.
4. At this point in time, we wish to raise an issue of grave concern with the Committee. On 29 and 30 April 2010, the Department of Communications hosted a symposium on technical standards for DTT. It appears that,

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notwithstanding a Cabinet decision adopting DVB as the standard for the country, the Department is seeking a change from DVB-T to a new standard, known as ISDB-T.

5. It is not clear to M-Net why a symposium on standards was necessary or why the Department is contemplating a change of standards given the following:
 - 5.1. A detailed comparative analysis of the technical capabilities of all available standards, was undertaken by two independent ministerial advisory bodies in 2002, and again in 2005. The DVB standard was recommended following this process.
 - 5.2. The Department of Communications accepted those recommendations, and adopted DVB as the relevant standard for the country in its 2008 Digital Migration Policy.
 - 5.3. The entire SADC region has planned, co-ordinated, and in certain instances implemented, its migration to digital based on the DVB standard.
 - 5.4. South Africa's Terrestrial Broadcasting Frequency Plan is based on the DVB standard.
 - 5.5. Broadcasters, at considerable cost, have successfully been conducting DTT trials since 2008 using the DVB standard. As mentioned, M-Net alone has already invested in excess of R40 million in its DTT trial which investments included network deployment and development of a fully interoperable pay-TV set top box.
 - 5.6. The Committee has approved extensive funding for Sentech to deploy infrastructure based on the DVB standard.
 - 5.7. The South African Bureau of Standards has adopted DVB as the relevant standard in SANS 862, its standard for free-to-air terrestrial set-top boxes.
 - 5.8. Despite its references to the need to consider "new information" regarding standards, the Department has not provided any new information which would suggest South Africa erred in its decision to adopt DVB as the standard.
6. For the benefit of Committee members who were unable to attend the symposium, our technical experts have considered the claims which were made, the implications of a possible change in standards and the consequences for broadcasters and country as a

whole. We have consolidated our findings and they are attached to this letter in the following annexures:

- 6.1. Annexure A : Process
 - 6.2. Annexure B : Technical Assessment of Standards
 - 6.3. Annexure C: STB Aspects
7. Broadcasters were not given an opportunity to present at the symposium and it is in frustration that we turn to the Committee to consider the consequences of South Africa changing its elected standard at this late stage. In order to implement a new standard, the following would be required:
- 7.1. The Cabinet decision to adopt DVB as the standard for South Africa, as expressed in the Department's Digital Migration Policy, would have to be amended or revoked.
 - 7.2. South Africa would need to renegotiate the ITU Regional Agreement to which it is a signatory.
 - 7.3. South Africa would need to renegotiate and re-coordinate the SADC band plan with our neighbours in the SADC region.
 - 7.4. The SABS would need to withdraw the SANS 862 standard and restart the public process to determine a specification based on a new standard.
 - 7.5. ICASA would need to initiate a public process on amending the Terrestrial Broadcasting Frequency Plan.
8. Our concern is that the finalisation of the procedures outlined in the preceding paragraph will take considerable time, time which South Africa does not have if it is to meet the deadlines which have been set for migration to digital television. Furthermore, every year that the migration is delayed, means another year of delay in the delivery of the digital dividend. That delay will have a devastating impact on the growth of South Africa's communications sector and the ability to deliver communications services, including but not limited to wireless broadband services, to the people of South Africa.
9. We trust this submission and the attached annexures will be of assistance to the Committee when it engages with the Department and other state-owned entities on 1 June 2010.

Should the Committee require any additional information or clarity, we would be happy to provide it.

Yours sincerely



Karen Willenberg

Director of Regulatory and Legal Affairs