

SUBMISSION

45 South Television

Community Television station

Television broadcaster

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- 1a. Yes! You cannot plan anything without a clear playing field!
- 1b. All analogue licences should be cancelled at ASO. Licensees holding such licences should have to prove that they were in use at ASO and not just held for speculation, and not used for simulcast. Broadcasters holding licences in use at that time should be given a right at no charge to themselves to be granted a digital licence to continue their service.
- 2a. Yes! Needed for effective long term frequency management!
- 2b. Yes! It is the only fair way!
- 2c. Mandatory consolidation of the licensee's broadcast channels onto the minimum practical number of digital licences, surrendering all other licences held and accepting frequency changes and technical parameters BEFORE the new licence is issued!
- Such frequency allocations to take into consideration that the licensee will most likely require to use H.D. services in the near future. Hence all frequencies granted should be on the basis that H.D. is the ultimate aim and that any frequency/parameter changes needed for H.D. must be incorporated BEFORE the licence is issued! It is too expensive to the licensee and inconvenient to the public to have their TV channels moved all over the place!
- 3a. Yes! Government should ensure that there is opportunity, at no greater cost, for users than that in place now, for new players to enter the broadcasting field. New Zealand does not want their TV market to be dominated by a few very large players!
- 3b. There should be opportunities to implement a mix of policies to ensure fair and equitable use of the frequency spectrum by existing and new users.
- The allocation of multiplex digital licences for the main population areas and some other areas to be served by national broadcasters would ensure the most efficient use of spectrum.
- However, this model would stray away from the existing analogue situation where everyone has invested in their own equipment per channel.
- Broadcasters who wish to implement nation wide services i.e.; TV.1.2.3 and Maori TV. Should share a multiplex where possible.
- Regional TV however presents entirely different problems. Regional TV usually covers much smaller population areas and can be a mix of commercial and non-

commercial operations. Nearly all of these regional stations would find it hard to finance the cost of the change over to digital operation.

In our case (45 South TV), a non profit making community station having recently invested in our analogue set up, could not afford to go digital, or afford an "on going" rental of a multiplex!

Maybe the most efficient method to achieving spectrum use and affordability would be to let regional and community stations NOW EXISTING to be granted a digital multiplex licence with government assistance to purchase same. This would help in the future to assist funding their operations by leasing out the facility to NEW users. Multiplex ownership should not be vested solely in the larger players; this would risk monopoly operation and ultimately, less choice!

The government MUST be prepared to financially assist the smaller players who will otherwise be disadvantaged financially, in the move to digital!

4a. Yes! This will allow for a level playing field at the start of the digital service.

4b. (1.) Yes! They should all expire together at ASO. Again to simplify the granting of future licences.

(2.) A twenty year right of renewal is a good thing after ASO as it gives security of tenure and aids future planning by broadcasters.

(3.) No! This will require new government legislation and investment!

SUMMERY. No broadcaster should be disadvantaged financially by the move to digital.

All analogue licences to finish at 2010.

New digital licences to be granted for twenty years from ASO.

Government should assist EXISTING regional TV stations to own their own multiplex to the level that they are not disadvantaged by the change to digital. This will allow them to charge "new users", and assist their funding. In the case of more than one existing regional service (i.e.; not nationwide coverage) operating in the same area, then ownership should be divided equally.

The cost to the government in funding multiplexers to regional stations would be more than covered by "the digital dividend", and would assist greatly the community TV stations in their funding situation.

Government funding of regional TV multiplexers should include the cost of any necessary infrastructure needed to connect to and operate same.

To help implement nationwide coverage for the national broadcasters it might help if the regional multiplexer owners were asked to carry their service at a reduced charge!

This would help in insuring that maximum coverage of the digital service is implemented at the outset.

For and on behalf of, 45 South TV.

Tony Reynolds.