

**SUBMISSION TO MBIE ON
FIXED SERVICES DISCUSSION DOCUMENT**

13 MARCH 2015



Introduction

This submission is made on behalf of Television New Zealand Limited (TVNZ), in response to the Ministry of Business, Innovation & Employment's *Fixed Services in New Zealand Discussion Document: Ensuring efficiency in the backbone of the digital economy*.

We thank the Ministry for the opportunity to comment on the discussion document, and look forward to further engagement with the Ministry.

This submission is restricted to three areas of particular concern to TVNZ, namely:

- Section 3.7 – L Band
- Section 3.12 – V Band
- Section 3.17 – X Band

Responses to specific questions:

Section 3.7 – L Band

Question 29. What services should L band be used for in the future? Why?

The L Band is used by some Satellite Earth Stations and TVNZ urges the Ministry to consider this existing use when considering any future uses of the L Band.

Section 3.12 – V Band

TVNZ notes that there is heavy, intermittent (and occasionally concentrated) demand for TVOB channels.

Question 37. Should new 56 MHz channels V23A (7110.5 MHz) and V23A# (7341.5 MHz) be created? If so, could the new 56 MHz channels coexist with the TVOB channels currently in place? What would be an acceptable coordination policy if this were to occur? Should the new 56 MHz channels be available only on a non-interference basis?

No. It would be difficult to guarantee non-interference when it is not known when and where OB links will be required.

Television OB linking is by nature not a 'fixed' service and therefore requires special protection. It cannot be secondary to another service if that means its deployment cannot be depended upon by Broadcasters, which is what a requirement to co-ordinate with fixed licences would mean.

Alternatively, OB links are often rapidly deployed. Even if a new channel is licenced for use on a non-interference basis with TVOB usage, it could not be relied upon.

It must also be noted that TVOB use is almost always 'live'. The impact of any interference would be immediate and disruptive to live broadcast, with ramifications to commercial revenue and widespread and obvious public impact. This may include any disaster response that TVNZ is expected to assist with.

Question 38. Can existing demand for the TVOB channels in V band be accommodated on other TVOB channels?

No.

TVNZ considers that there are several barriers to this:

1. The other TVOB band is already heavily used and not able to accommodate the displaced users from the V band.
2. TVNZ's existing equipment would be unusable.
3. TVNZ would have to bear the cost of new equipment, in addition to the write-off cost of existing equipment. TVNZ has invested considerable sums in upgrading our V band equipment.
4. Any new band must be internationally coordinated. TVNZ continues to suffer increased cost and reduced utility from the forced move from the O band to the (not internationally coordinated) OX band.
5. Modern productions are becoming more sophisticated, and require a greater number of links.

Section 3.17 – X Band

Question 50. Should the Ministry introduce an additional 56 MHz channel to the X band, or should it remain unavailable for assignment?

TVNZ urges caution and proposes that users of the Ku band in the DTH industry must be consulted with the results of studies into any potential addition to the X band.

TVNZ would be happy to answer any questions or clarify its response.

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