

SBS RESPONSE TO AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY 'SPECTRUM SHARING – OVERVIEW AND NEW APPROACHES' INFORMATION PAPER SEPTEMBER 2019

Introduction

The Special Broadcasting Service Corporation (**SBS**) appreciates the opportunity to comment on the Australian Communications and Media Authority (**ACMA**) *Spectrum sharing – overview and new approaches* Information Paper (the **Information Paper**).

SBS is unique in the Australian media environment, providing multilingual, multicultural and Indigenous radio, television and digital media services that inform, educate and entertain all Australians and, in doing so, reflect Australia's multicultural society.

SBS reaches almost 100 per cent of the population through its six free-to-air TV channels (SBS SD, SBS HD, SBS VICELAND HD, SBS World Movies, SBS Food and National Indigenous Television (**NITV**)) and seven radio stations (SBS Radio 1, 2 and 3, SBS Arabic24, SBS PopDesi, SBS Chill and SBS PopAsia). Servicing 68 languages including SBS Arabic24, SBS Radio is dedicated to the nearly five million Australians who speak a language other than English at home, while the three music channels (SBS PopAsia, SBS PopDesi and SBS Chill) engage all Australians through music and pop culture from around the world.

SBS's reach is being significantly extended through SBS's digital services, including SBS On Demand, the SBS Radio App and portals which make online audio programming and information available to audiences at a time and place of their choosing.

Television White Space (TVWS)

The broadcasting services band (**BSB**) spectrum is critical to SBS in the delivery of content to the major part of its audience base (i.e. free to air (**FTA**)). While there is merit in exploring opportunities for spectrum sharing to enable new applications, this should not come at the expense of the integrity of SBS services.

SBS (and other FTA broadcasters) continue to use out-of-area 'fortuitous' reception for the retransmission of off-air terrestrial services to provide infill in coverage black-spots ('parent' signal reception and 'child site' retransmission). In order to avoid significant additional costs, adequate protection for this reception must be assured to ensure no interference from otherwise 'hidden nodes' under a spectrum sharing arrangement such as TVWS.

Although the out-of-area reception of the parent signal is not 'protected' under the ACMA planning parameters, this method is extremely cost effective and in the majority of cases has been the preferred signal source for retransmission. Exceptions to this arrangement are mostly limited to cases where the incoming signal is unreliable, prone to interference, or may not be feasible in certain single frequency network (**SFN**) configurations. In the event that the 'parent' source for retransmission became unviable as a result of spectrum sharing, SBS and other broadcasters would need to procure an alternative technology arrangement to deliver the source signal for retransmission at the infill location. For SBS this would necessitate procurement of a microwave link, fibre feed, or satellite downlink, at significant cost.

In formulating its regulatory policy which facilitates the use of 'white space' devices, Ofcom, the United Kingdom's communications regulator, engaged in a broad range of consultations, over many years (circa 2007 to 2015), and worked closely with the broadcast and communications industries. Ofcom rejected the inclusion of cognitive radio ('sensing' devices)¹ and adopted a geolocation database approach to provide assurance of interference-free operation of white space devices and management controls to effect the cessation of interfering devices.^{2,3} SBS recommends that the ACMA further investigate these specific issues.

Other spectrum (i.e. non-BSB)

Although SBS may procure services that utilise other spectrum blocks, primary operators and infrastructure owners are better placed to provide comment in these cases.

Conclusion

As part of regulatory consideration of the adoption of TVWS, and white space devices more generally, SBS recommends that the ACMA undertake further in-depth studies. These may be similar in scope to those carried out in the United Kingdom, and may draw on Ofcom research, and other international experiences.

In the interim, the status quo should be preserved so there is no disruption to the existing use of this spectrum by broadcasters delivering services to Australian audiences.

SBS also recommends extensive Australian industry consultation, and thorough field testing in the Australian environment.

¹ Ofcom – Implementing Geolocation (Sep. 2011), paragraph 3.78
https://www.ofcom.org.uk/_data/assets/pdf_file/0035/46889/statement.pdf

² Ibid

³ Ofcom – Implementing TV White Spaces (Feb 2015)
https://www.ofcom.org.uk/_data/assets/pdf_file/0034/68668/tvws-statement.pdf