

SBS RESPONSE TO THE AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY'S (ACMA) FIVE YEAR SPECTRUM OUTLOOK CONSULTATION DRAFT APRIL 2022

Introduction

The Special Broadcasting Service Corporation (**SBS**) welcomes the opportunity to comment on the Australian Communications and Media Authority's (**ACMA**) *Five-year spectrum outlook (FYSO) 2022-27 work program Draft for Consultation* (the **Consultation Draft**).

As stated in SBS submissions to previous FYSO consultations, SBS values the visibility the FYSOs provide regarding ACMA's views on the environmental, regulatory and policy factors which will influence the acquittal of its spectrum management functions. SBS is highly supportive of the consultation effected through the FYSO and the opportunities provided to stakeholders to submit feedback.

SBS's principal function is to provide multilingual and multicultural radio, television and digital media services that inform, educate and entertain all Australians, and in doing so, reflect Australia's multicultural society. SBS has been proudly serving Australia and our multicultural communities for more than 45 years. Along with our principal function, our purpose is to inspire all Australians to explore, respect and celebrate our diverse world, and in doing so, contribute to a cohesive society. SBS makes extensive use of planned radiofrequency spectrum to deliver these vital public benefit outcomes and this submission is informed by SBS's ongoing need for access to that spectrum to maintain, expand and enhance its services for the benefit of the Australian community.

As an example, SBS has recently announced that it will further expand its multilingual services in 2022, with the launch of a new free-to-air television channel providing news from around the world, within its existing spectrum footprint. The new channel, SBS WorldWatch, will also be the home to our new 30-minute [SBS العربية News](#) and [SBS 中文 News](#), produced locally by SBS, and broadcast in prime time every weeknight. The services are already streaming on SBS On Demand.

These services are more relevant than ever given one in two Australians has a migrant background, approximately 20 per cent speak a language other than English at home and 28 per cent were born overseas. SBS has an increasingly important role to play in meeting the Australian population's changing needs and driving social cohesion, including because:

- Australia is one of the most multicultural developed nations in the world, with twice as many residents born overseas (30%) as the United Kingdom (14%) or the United States of America (14%).¹

¹ McCrindle Research Pty Ltd, *Australia towards 2031 – The demographic, consumer and behavioural trends shaping the nation* (2021)



- Since 2001, the number of people 'not only speaking English at home' increased from 2.8 million to nearly 5 million in 2016 (latest Census), representing an increase of more than 2 million individuals.²

It is also relevant to note the important role that SBS plays in delivering First Nations media, as a network and in particular through NITV. We are constantly evolving our services to meet the needs of the Australian community and certainty of spectrum access continues to be critical.

Issues for comment

Market and technology drivers of change in spectrum demand

We welcome the ACMA's setting out of its current appraisal of factors impacting on spectrum demand. In particular, we note the discussion regarding broadcast spectrum and the following statement:

Evolving digital transmission technology and changes in viewer and listener behaviour are altering the modes of delivery and, consequently, changing the broadcasting demand for spectrum.³

Whilst it is evident that the ways that audiences are accessing content have changed substantially over the last decade, we are more cautious regarding drawing conclusions that this will impact spectrum demand in the immediate and short-term future. Whilst reaching audiences through new delivery pathways, broadcasters continue to serve almost all of the Australian population via terrestrial transmission (with some access via VAST) and remains the preferred mode of consumption for many. The quantum of spectrum required to provide geographically extensive coverage does not change if a proportion of the audience complements terrestrial television viewing or radio listening with, or switches to alternative delivery pathways.

SBS will continue to require allocations of terrestrial broadcast spectrum on an ongoing basis, to ensure it can continue to deliver its current suite of services, improve the quality of those services, and have the option to increase the number of services available for audiences. In addition, we note that ongoing access for all Australians to ubiquitous public service content, which is free to access, is more important than ever, given the heightened need for trustworthy sources of news and information in times of global crisis.

Indeed, when the bulk of alternative entertainment and information choices require payment of a subscription fee, and access to high-speed broadband, the importance of trustworthy services which are free to access is only heightened.

SBS notes these issues are being explored through the ongoing policy conversations occurring between industry, Government and other stakeholders regarding the future of terrestrial television broadcasting through the Future of Television Working Group.

600MHz band

SBS notes the ACMA has elected to retain the 600 MHz band at the 'monitoring' stage.⁴ This is appropriate given the Minister is effectively leading the policy process regarding the future of spectrum use in this band. We also note the Minister has set out a range of research projects intended to support future decision-making, and this reinforces the appropriateness of retaining this band in the 'monitoring' category for the foreseeable future.

² Australian Bureau of Statistics, Migration Australia 2019 -20 financial year, Census 2016

³ FYSO Consultation Draft p 17

⁴ FYSO Consultation Draft p 24



SBS looks forward to working with the ACMA, including through the Future of TV Working Group, to help provide industry perspectives and expertise into these research programs.

As has been consistently noted by terrestrial broadcasters, a critical issue in any future planning decisions regarding this band will be effective management of interference issues arising from the introduction of 5G services into bands adjacent to terrestrial television broadcasting.

Interference mitigation strategies will need to be fully investigated and scoped as part of the work plan for the 600 MHz band. We are concerned to ensure that the different network architecture of 5G services (when compared to 4G) is accounted for in interference management planning. In particular, specific focus should be placed on the extent to which there will be households affected by 5G interference to such a degree that they are required to obtain television from sources other than terrestrial broadcasting (we note 'alternative sources' typically require payment of subscription fees, which raises equity issues). We recommend this work be included in the future work plan.

We also note that references to the US and other markets where 5G has been deployed in the band must always be made with caution, given the different rates of reliance on terrestrial broadcasts in those markets compared to Australia (that is, the significantly higher reliance by Australian audiences on free terrestrial broadcasting than US audiences).

Reallocation of C-Band spectrum

SBS notes the ongoing work regarding alternative uses for the 3400 -4200 MHz band. SBS notes the ACMA is currently consulting on a proposed spectrum re-allocation declaration for the 3.4 GHz and 3.7 GHz bands.

Utilisation of the C-band is vitally important to SBS both for the reception of international news programs in more than 30 languages, as well as the extensive range of other international content. For example, SBS has recently announced the launch of a dedicated SBS WorldWatch channel, a new free-to-air channel featuring an extensive line-up of bulletins from leading international broadcasters in more than 30 languages. This channel, and the benefits it will provide to multilingual audiences, would not be possible without the ability to reliably receive international programming feeds via FSS earth stations.

SBS will make a submission to this C-band consultation which reiterates the ongoing importance of ensuring that any changes to use of the band must not delay or prevent the delivery of core SBS content, which delivers on SBS's Charter obligations.

Other areas of interest

SBS also notes its ongoing interest in a number of other spectrum planning initiatives noted in the FYSO Consultation Draft, including:

- Conversion of AM radio services to FM – SBS has previously supported the consideration of Digital Radio Mondial as a successor to analogue radio
- Enhancing coverage of radio services; and
- Planning for regional DAB+ roll out