

SBS SUBMISSION TO AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY'S (ACMA) FIVE-YEAR SPECTRUM OUTLOOK 2023–28 WORK PROGRAM CONSULTATION DRAFT (April 2023)

KEY POINTS

- The latest Australian Census has demonstrated that SBS's television, radio, and online services for all Australians—including multicultural, multilingual, and First Nation peoples—are now more essential than ever.
- There are now more than 5.6 million people in Australia¹ who use a language other than English at home, the highest number in any Australian Census.¹
- This ever-increasing significance of SBS services means that there is also increasing importance in SBS's use of spectrum. SBS appreciates engagement with the ACMA, including through the FYSO consultation.

Future of television and UHF band

- SBS notes the early indication from the ACMA, through this year's FYSO, on the mobile industry's prediction that the forthcoming 6G technology will require spectrum across a range of bands including the UHF band SBS currently utilises for its digital terrestrial television (**DTT**) transmission.
- The Future of Broadcasting Working Group, in which SBS will continue to participate, is the appropriate forum for considering the future of television technologies and related reforms, including in relation to the UHF spectrum band.
- SBS operates a number of television channels, including National Indigenous Television (**NITV**), Australia's only national service by, for, and about First Nations peoples. In addition to consideration of the communications needs of contemporary Australia as a whole, SBS recommends that the ACMA's Television Research and Policy Development Program and future reforms in delivery of television specifically consider the needs and media consumption preferences of First Nations peoples across Australia, including in regional and remote areas, in line with the ACMA's support of the Government's Closing the Gap policy priorities.² This may include an ongoing need for DTT services for regional and remote First Nations communities.

Reallocation of C-band (up to 4000 MHz)

- SBS is currently working closely with its satellite-delivery technology partner, Telstra, to analyse the impact of the ongoing reallocation and find alternative deliveries for a range of incoming overseas content being impacted, including twelve of *SBS WorldWatch* in-language news bulletins and many live sport programs such as the most recent FIFA World Cup. This content is currently being delivered to SBS via Telstra's satellite downlink facilities located in Oxford Falls, NSW, which is an area covered by the reallocation.

¹ According to the 2021 Australian Census data, which can be viewed through the easy-to-use and visualised SBS Census Explorer tool available in nine languages at: <https://www.sbs.com.au/news/creative/census-explorer/xtjxeqygs>. This cohort has grown at approximately 16 percent since the 2016 Census, almost double the growth rate of the general Australian population. Moreover, the number of those whose use of English was 'not well' or 'not at all' has also grown from more than 810,000 to more than 870,000 people.

² The Consultation Draft, pages 9 and 11.



Technology trials

- SBS appreciates the ACMA's engagement, and openness to industry-driven initiatives and ongoing support for new technology trials.

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) 2023–28 work program—Consultation draft* (the **Consultation Draft**).

SBS continues to value 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 continues to be highly supportive of the consultation effected through the FYSO and the opportunities provided to stakeholders to submit feedback.

FUTURE OF TELEVISION AND UHF BAND

SBS notes the early indication from the ACMA, through this year's FYSO, on the mobile industry's prediction that

'[...] the deployment of 6G will require spectrum across a range of bands, from 460–694 MHz through to the midbands 7–20 GHz, as well as sub-terahert [...].'³

We note that the ACMA has elected to retain the 600MHz (617–698 MHz) band at the 'Monitoring stage'.⁴ This foreshadowed future spectrum demand for 6G technology intersects with the television broadcasting spectrum bands SBS currently utilises for DTT. In particular, the 600 MHz band forms a core component of the ultra-high frequency (**UHF**) spectrum (520–694 MHz) underpinning delivery of SBS's entire DTT services (including its suite of seven radio services embedded in the SBS multiplex). These are carried by more than 530 licenced transmission and retransmission sites.

SBS notes that the Consultation Draft also discusses the timeline of 6G—

'[t]he mobile industry's research attention on 6G continues, with some predicting commercialisation around 2030'.⁵

and relevant international context—

'[i]n addition, the Radio Spectrum Policy Group (RSPG) of the European Commission (EC) provided a long-term strategy for the future of the UHF band, which suggests the band remain available for broadcasting services until at least 2030'.⁶

In relation to this as well as any future reforms impacting television technologies, SBS and the ACMA have been part of the Future of Broadcasting Working Group established by the Government. The Working Group, in which SBS will continue to participate, is the appropriate forum for considering future television technologies and related reforms.

PLANNING AND RESEARCH PROCESSES SHOULD CONTINUE TO FOCUS ON THE NEEDS OF FIRST NATIONS COMMUNITIES

As SBS is home of NITV, SBS recommends that the ACMA's Television Research and Policy Development Program and any future reforms in delivery of television consider, as a distinct piece of work, the needs and media consumption preferences of First Nations peoples across Australia including in regional and remote areas. This will also be in line with the ACMA's

³ The Consultation Draft, page 14

⁴ The Consultation Draft, page 28.

⁵ As above.

⁶ The Consultation Draft, page 30.



support of the Government's Closing the Gap policy priorities outlined in the Consultation Draft.⁷

Therefore, the need for television broadcasting spectrum for DTT will continue to be important into the future for regional and remote First Nations communities, due to instances of VAST technology not being accessed, and insufficient broadband coverage posing limitations to Internet Protocol (IP) delivery of television in these communities.

Overall, VAST remains an important safety net for all Australians, especially those in regional and remote communities. Nonetheless, individual community needs should be taken into account researching and planning spectrum where terrestrial delivery is also an option.

Example – Mapping the Digital Gap research insights

In November 2022, Dr Daniel Featherstone of RMIT University made a presentation at the ACMA's *RadComms 2022* conference in Melbourne, of the *Mapping the Digital Gap*⁸ research, published by the Australian Research Council's Centre of Excellence for Automated Decision-Making and Society in October 2022.

In his presentation, Dr Featherstone revealed that the research process had uncovered that approximately 60 percent of VAST facilities were in unserviceable conditions in many First Nations communities involved in the research. A further example was also provided in the presentation—that in one community, 100 percent of community members were unable to access television content through existing VAST facilities at all due to unserviceable equipment. The community also had no access to DTT, thus resorted to limited and intermittent 4G mobile coverage for news, information and content—including via social media services (which particularly consumes less mobile data).

The above example corroborates SBS's view—that consideration of the needs, available facilities, and media consumption preferences of First Nations peoples across Australia, including in regional and remote areas, is of paramount importance and should be an integral component when future television technologies are being considered.

REALLOCATION OF C-BAND SPECTRUM

Directly relevant to SBS's receiving of content from overseas via satellite, SBS acknowledges that the 'Implementation stage' of reallocation and apparatus licensing process is already underway by the ACMA—for 3700–4200 MHz spectrum band (C-band), particularly at the lower-end of this band (up to 4000MHz) in both regional and metropolitan areas. SBS is currently working closely with its partner, Telstra, to analyse the impact of the current reallocation, and find alternative deliveries for incoming overseas content being impacted.

This content directly fulfils SBS's Charter obligations as it includes, among other things, more than 60 international news programs in more than 35 languages for the *SBS WorldWatch* service, as well as international sports and other programs from overseas for Australian audiences.

SBS is continuing to work with Telstra to prevent disruption to the provision of this content to SBS audiences.

ONGOING ENGAGEMENT

SBS supports the ACMA's commitment to the broad suite of international engagements, particularly in relation to relationship with and cooperation between Australia and the Indo-

⁷ The Consultation Draft, page 11

⁸ *Mapping the Digital Gap* research, which aims 'to generate the most detailed account to date of the distribution of digital inclusion and the uses of digital service', is available at <https://apo.org.au/sites/default/files/resource-files/2022-10/apo-nid319809.pdf>



Pacific.⁹ SBS notes that the Australian Broadcasting Corporation (**ABC**) has a key role in transmitting Australian content internationally in accordance with its legislative role. SBS supports the ABC's work in this area including by SBS's provision of its Gagana Samoan audio content, via ABC Radio Australia, to audiences across the Pacific.¹⁰

Recent SBS Language Services Review (**LSR**) reveals that SBS is more relevant to the Indo-Pacific than ever before.

Every five years, SBS performs its LSR to examine our language offering and ensure our services reflect and meet the needs of Australia's rapidly changing and increasingly diverse society.

The results of the latest LSR were announced in March 2023, reflecting the recent and significant growth in Australia's population from the Indo-Pacific region. The results have also seen three new languages from the region being added to SBS services—Bislama¹¹, Malay¹², and Tetum¹³ as well as SBS's recommitment to servicing Telugu and growing its Punjabi and Nepali services.

CONCLUSION

SBS acknowledges the ACMA's ongoing commitment to consultation with SBS, which is of increasing significance, and with the industry on its work program; and looks forward to future opportunities for input, collaboration, and engagement on relevant topics.

⁹ Consultation Draft, page 2

¹⁰ More information on this available at <https://www.sbs.com.au/aboutus/sbs-gagana-samoan-to-be-broadcast-on-abc-radio-australia>

¹¹ Used in Vanuatu

¹² Used in Malaysia, Singapore, Brunei, and Indonesia

¹³ Used in Timor Leste and West Timor