



Submission by Free TV Australia

**ACMA Draft Five-year Spectrum
Outlook 2025-30**

April 2025

1. Issues and comments

- Free TV appreciates the opportunity to comment on the ACMA's Draft 2025-30 Five-year Spectrum Outlook (FYSO).
- The annual publication of Draft and Final FYSOs provides spectrum users with a high, and appropriate, level of transparency and accountability about the regulator's spectrum regulatory priorities.
- Free TV offers two comments only, relating to the mySwitch website and UHF TV spectrum planning.

1.1 mySwitch

- The Viewer Access Satellite Television (VAST) service provides direct-to-home (DTH) TV services to Australians without terrestrial coverage. The geographically limited nature of the programming rights makes encryption of the commercial TV services necessary.
- The conditional access scheme is currently administered by regional commercial broadcaster organisation RBA-H and its contracted service-provider, NAS Australia.
- The requirement for encryption, and hence for a conditional access process, is currently mandated in legislation. For commercial reasons Free TV does not expect it to go away.
- An average of 220 new requests are received each week¹. This includes viewers who need to replace existing set-top units as well as travellers and any new in-area or out-of-area customers.
- For historical reasons, the ACMA's mySwitch website provides the sole portal to the conditional access scheme. If the mySwitch portal stopped working, there is currently no other way for these viewers to apply for and obtain access to commercial television via VAST.
- The relationship between mySwitch and the VAST conditional access schemes raises practical issues for RBA-H and the remote commercial TV broadcasters that are urgent in proportion to the likelihood (if any) that mySwitch will cease to be available, or cease to be able to be updated, in the short to medium term.
- The ACMA has previously warned that the mySwitch tool has only a limited future lifespan. For example, in a June 2018 submission to the Department the ACMA said:

..., the tool is now almost 10 years old and may not be sustainable as maintenance and support becomes increasingly problematic².
- As Free TV is unaware of any ACMA plans to refresh the tool, it is becoming timely for discussions with the TV industry about the nature, seriousness and potential timing of any risks to the site's operation.

¹ Information from NAS Australia.

² The full statement is excerpted at Attachment A.

1.2 PMSE in TV UHF spectrum

- As in previous years, the ACMA will be playing a subordinate role to government in relation to the exploration of future options for television broadcasting, ‘which may include considering its future spectrum needs’.
- Minister Rowland has also signalled renewed interest in the possibility of realising a second ‘digital dividend’ from the re-farming of any spectrum not required for TV.
- Free TV will be taking an active role in these policy discussions and looks forward to the engagement of ACMA’s technical experts as key sources of technical advice on spectrum planning issues.
- Free TV is respectful of the ACMA’s general disposition to avoid anticipating possible outcomes of Government policy consideration of TV UHF issues. This disposition is on display in ACMA’s decision to leave 600 MHz at the ‘monitoring’ stage of its own re-planning processes. Similarly, in relation to Stage 3 of the ACMA’s ongoing review of Spectrum Licence Expiry issues, the ACMA has sensibly declined to speculate about any implications of potential 600 MHz outcomes, observing:

‘...the government’s exploration of pathways for the future of television is likely to be a complex process extending into the mid- to longer-term, meaning that the extent to which we can take its outcomes into consideration in the ESL process is uncertain.’

- Taking care not to anticipate Government policy should not mean a completely passive role for the regulator, which has knowledge and expertise not necessarily available to the Department, and which is occasionally best-placed to speak up for the ‘empty seats’ in the coming policy discussion – meaning parties that may not yet realise they are key stakeholders.
- Any change to broadcasting spectrum use will have implications for secondary users of TV spectrum, notably, Program Making and Special Events (PMSE) devices such as wireless microphones and in-ear monitors authorised by the LIPD class licence.
- Currently vacant TV channels are heavily used for PMSE, by broadcasters themselves but, as importantly, by the entertainment and community sectors.
- Most realistic scenarios for 600 MHz re-farming would see steep reductions in the availability of TV ‘white space’ as well as questions about the utility of the 600 MHz guard bands and mid-band gap for PMSE. As was the case with the previous digital dividend process in Australia, helping PMSE users negotiate these changes is likely to become a key ACMA responsibility and a source of controversy if done poorly.
- Work to scope out the challenges and mitigations for PMSE users should begin early. Any requirements to replace existing PMSE equipment will have important timing consequences for TV UHF re-planning independent of TV or mobile network operator (MNO) needs or wishes. Hypothetically this might include lead-times for government or the regulator to clarify alternative spectrum options, for manufacturers and suppliers to source future-compatible equipment, and for entertainment and community sector users to prepare for the changes.
- Given the risk that PMSE use of TV UHF may otherwise become a source of delay and distraction to re-planning of TV UHF spectrum, the ACMA should be informing itself now about options and mitigations for PMSE in a post-digital dividend world (if it is not already doing so).

- It would be disappointing if the secondary user ‘tail’ ended up wagging the 600 MHz ‘dog’.

2. About Free TV Australia

Free TV Australia is the peak industry body for Australia’s commercial television broadcasters. We advance the interests of our members in national policy debates, position the industry for the future in technology and innovation and highlight the important contribution commercial FTA television makes to Australia’s culture and economy.



Australia’s commercial broadcasters create jobs, provide trusted local news, tell Australian stories, give Australians a voice and nurture Australian talent.

A report released in September 2022 by Deloitte Access Economics, *Everybody Gets It: Revaluing the economic and social benefits of commercial television in Australia*, highlighted that in 2021, the commercial TV industry supported over 16,000 full-time equivalent jobs and contributed a total of \$2.5 billion into the local economy. Further, advertising on commercial TV contributed \$161 billion in brand value. Commercial television reaches an audience of 16 million Australians in an average week, with viewers watching around 3 hours per day.

Free TV Australia’s members are vital to telling Australian stories to Australians, across news, information and entertainment. Free to air television broadcasters understand and appreciate the cultural and social dividend that is delivered through the portrayal of the breadth and depth of Australian culture on television, and Australians prefer local stories. Commercial television networks spend more than \$1.67 billion on Australian content every year, dedicating over 87% of their content expenditure to local programming.

The commercial television industry creates these benefits by delivering content across a wide range of genres, including news and current affairs, sport, entertainment, lifestyle and Australian drama. At no cost to the public, our members provide a wide array of channels across a range of genres, as well as rich online and mobile offerings.

A strong commercial broadcasting industry delivers important public policy outcomes for all Australians and is key to a healthy local production ecosystem. This in turn sustains Australian storytelling and local voices and is critical to maintaining and developing our national identity.

Attachment A

Excerpt from ACMA submission 'Response to Department of Communications and the Arts Review of Viewer Access Satellite Television (VAST)', June 2018

4. mySwitch: Role and future

mySwitch was developed by the Department in 2009/10 as one of the key components of the communications strategy to help television viewers during the digital switchover and restack. mySwitch provides address specific information about the television coverage, the most appropriate transmission site to receive TV signals from and the antenna setup required for optimal reception from the selected broadcast site. mySwitch is also the application portal ("front counter") for access to VAST. No similar alternative source of location specific information about television coverage is currently available.

Since the general public still makes extensive use of mySwitch for its originally intended purposes, including access to VAST, the ACMA has continued to manage mySwitch after the completion of the digital switchover and restack³ notwithstanding that all funding for the initiative was digital transition linked and has ceased.

mySwitch plays two important roles in relation to VAST:

mySwitch provides location specific advice on expected TV coverage and therefore informs viewers if they need to consider VAST access. As previously discussed, the ACMA understands that mySwitch is also used by the current CAS administrator to assess VAST applications for Category C areas.

mySwitch provides the only entry point for the VAST access applications for the commercial VAST services (access to the VAST services of ABC and SBS is not conditional and can be enabled outside of mySwitch).

According to Google Analytics, mySwitch has an average of 57,000 page views per month, with 22,000 sessions and 26,000 unique address searches (May 2018). A significant percentage of this use leads to or relates to the VAST access module.

By optimising mySwitch to retain relevant functionality but reduce the maintenance cost, the ACMA has managed to reduce mySwitch maintenance cost to approximately \$70,000 per annum including the site hosting and management and the cost of the Google Maps licence.

While the ACMA has been able to absorb these ongoing costs of mySwitch to date, the tool is now almost 10 years old and may not be sustainable as maintenance and support becomes increasingly problematic.

³ Following the successful completion of the digital switchover and restack, as a part resuming its traditional role as the community's first port of call in the government for viewer issues around TV reception and interference, the ACMA has taken over management of mySwitch.

The ACMA is actively considering a range of options for the future of mySwitch. Implementation of some of these options, in particular a substantially upgrading or building a replacement for the tool, is subject to funding being made available or industry (including app developers) taking over or building the replacement tool. The options under consideration include:

engaging with relevant industry stakeholders to discuss options for the future mySwitch, including an option for industry to take over the management of mySwitch. The feedback from industry to date recognises the importance of mySwitch but disclaims any responsibility for funding it;

upgrading mySwitch to the latest underlying software platforms to increase the lifespan of the tool - an estimated cost of this option is \$100,000+, but implementing this option could potentially reduce the current ongoing management cost to \$50,000 per annum;

building a replacement tool – a current ballpark estimate of the cost of this option is around \$150,000, noting that implementing this option could potentially reduce the current ongoing management cost of the tool;

the ACMA has recently published the TV coverage data used by mySwitch (<https://www.acma.gov.au/Industry/Broadcast/Spectrum-for-broadcasting/Spectrum-digital-television/myswitch-tv-coverage-prediction-data>) to encourage the development of a replacement tool by industry or app developers.

The CAS process for the VAST access is dependent on mySwitch. Both the Conditional Access Scheme and supporting processes would need to be completely redesigned if mySwitch were no longer available. If a replacement tool is eventually developed by industry or web developers using the now publicly available mySwitch TV coverage data, it is unlikely to include the VAST access module. Therefore, the role and future of mySwitch are relevant to the future of the CAS and should be considered under the Review.

