



**NAB WRITTEN SUBMISSION TO THE DEPARTMENT OF
TELECOMMUNICATIONS AND POSTAL SERVICES ON THE
DRAFT NATIONAL E-GOVERNMENT STRATEGY AND ROADMAP**

31 MAY 2017

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1. Introduction

- 1.1. The National Association of Broadcasters (the NAB) is a leading representative of South Africa's broadcasting industry, established in 1993. The NAB aims to further the interests of the broadcasting industry in South Africa, by contributing to its development. The NAB members include:
 - 1.1.1. the three television services and 19 radio services of the SABC;
 - 1.1.2. licensed commercial radio broadcasters (including media groups and independents: Primedia, Kagiso Media, Tsiya Group, AME, MSG Afrika, Classic FM, Kaya FM, YFM, Smile FM and Times Media Ltd-Vuma FM);
 - 1.1.3. licensed commercial television broadcasters (e.tv, Multichoice, M-Net, StarSat-ODM);
 - 1.1.4. a host of community radio broadcasters and community television broadcaster, Faith Terrestrial;
 - 1.1.5. both the licensed broadcast signal distributor and the selective and preferential common carrier broadcast signal distributors, Sentech and Orbicom;
 - 1.1.6. a range of associate members, including training institutions.
- 1.2. On 7 April 2017, the Department of Telecommunications and Postal Services (the DTPS), published in government gazette number 40772, an invitation to interested parties to submit their written representations to the draft National e-Government Strategy and Roadmap (the draft E-government Strategy). The closing date for written representations was 30 working days from the date of publication of the notice. Due to the number of public holidays in the month of April, which had an impact on the 30 working days provided, the NAB could not meet the gazetted closing date. Further it came to our attention that the DTPS was still to conduct roadshows on the draft E-government Strategy. To that end, the NAB communicated with Mr. David Monyepao from the DTPS regarding an extension of the due date for written submissions on 28 April and an extension was granted to the end of May. The NAB welcomes the opportunity to make its written representation, and appreciates the extension granted.

2. NAB inputs

- 2.1. The draft E-government Strategy, indicates on page 19, section 7 (iv) that one of the channels for e-government services is Digital television. The draft E-government Strategy further states that government services will be made available to the public on set-top-boxes (STBs). The NAB welcomes the call for collaboration by the DTSP with the Department of Communications (the DoC) as digital television falls under the purview of the DoC.
- 2.2. The DTSP must however be aware that the minimum specifications for free-to-air (FTA) STBs have already been determined by the South African Bureau of Standards (SABS). These SABS specifications include the technical capability (through a royalty-free system known as MHEG 5) to offer application services that will allow government information to be conveyed to citizens on a one-to-many basis. The Digital Terrestrial Television (DTT) trials carried out by SABC, e.tv and M-Net, used this capability to design and demonstrate an application service which could be offered by the Department of Home Affairs (the DHA). There is, however, no return path capability in the FTA STBs, so although content can be pushed to the STBs to be used in interactive applications, this interactivity is limited to the STB - the user cannot therefore request or engage in bi-directional communications with government on this device.
- 2.3. Furthermore, notwithstanding the current technical inability of the FTA STBs to do bi-directional communications, the FTA STB is not an optimal device to engage with citizens individually in any event. It is not a personal device, but rather a household/communal device. The device cannot be used to target specific individuals, nor can it guarantee the privacy of any electronic communications because of the public access nature of the television in the household.
- 2.4. Government already has the means to communicate with citizens on an individual basis, namely the mobile phone, which has a built-in return path for two-way communications. Mobile phone penetration in South Africa exceeds 100% whereas television broadcasting does not. So, for example, if a citizen renews his/her identity document or applies for a passport, government is able to inform the citizen by SMS that his/her document is ready for collection.

- 2.5. The FTA STB is meant to be an interim device allowing conversion of the digital signal to analogue for older analogue television sets until Digital television sets with integrated digital tuners are more widely available at affordable pricing in the South African market. In this regard, the NAB recommends that government policy be focused on looking at the development of e-government interactive applications for STBs and Smart televisions that simply facilitate information and knowledge sharing, as television devices with return path capability are unlikely to be broadly available in the SA market in the next five to ten years or until there is low-cost affordable broadband to make such television devices viable.

3. Conclusion

- 3.1. The NAB welcomes the opportunity to make its written submission.
- 3.2. The NAB would encourage collaboration between the DTPS and the DoC on matters relating to broadcasting, audio/audio visual and related technologies.