



**NAB SUBMISSION ON REGULATIONS IN RESPECT OF TECHNICAL
STANDARDS FOR ELECTRONIC TELECOMMUNICATIONS EQUIPMENT**

06 MARCH 2008

1. **Background**

On 7 February 2008 the Independent Communications Authority of South Africa (ICASA) published a General Notice (No 215 of 2008) in Government Gazette No 30753 (the Gazette). In terms of this notice, ICASA set out its intention to make regulations in respect of technical standards for electronic telecommunications equipment in terms of sections 35(1) and 36(1) of the Electronic Communications Act (“the ECA”), and inviting interested persons to submit comments by 6 March 2008.

1.1 The National Association of Broadcasters (the NAB) would like to thank the ICASA for the opportunity of making its written representation, in relation to the Notice.

1.2 The NAB is the leading representative of South Africa’s Broadcasting industry. The NAB aims to further the interests of the broadcasting industry in South Africa by contributing to its development. The NAB membership includes:

- Three television public broadcasting services, and eighteen sound public broadcasting services, of the South African Broadcasting Corporation of South Africa (the SABC);
- All the commercial television and sound broadcasting licensees;
- Both the licenced common carrier and the selective and preferential carrier broadcasting signal distributors;
- Over thirty community sound broadcasting licensees, and the first licensed community television broadcasting service, Trinity Broadcasting Network (TBN)

The NAB is an industry-wide association with a diverse membership that includes the public broadcaster, commercial free-to-air and subscription television licensees, commercial and community sound broadcasting licensees and signal distribution licensees as already outlined. The NAB will therefore confine its submission to high-level matters of common concern to its members. It is possible that NAB members will make more detailed submissions on matters of specific interest to them as individuals.

2. Response to Proposed Regulations

Firstly, the NAB supports the principle of such regulations and the compilation and publication of an official list of standards (Official List) applicable to electronic communications equipment and facilities, that will be regulated, and enforced by ICASA.

2.1 The NAB notes that the Official List as contained in section 10 of the Gazette, only pertains to Electromagnetic Compatibility (EMC) standards. Whilst recognising the importance of EMC in electronic communication systems including broadcasting, the NAB is of the view that the Official List should not be confined to EMC standards. The NAB therefore submits that the scope of the Official List should be expanded to include performance specification standards for electronic communications equipment and facilities that will be regulated by ICASA.

2.2 Ad section 10.1.3: Product/Product Family EMC Standards (Analogue and digital terrestrial TV broadcasting service transmitters)

The NAB notes that under “Analogue television”, reference is made to “System B” analogue TV transmitters, transposers and active deflectors. The NAB respectfully draws ICASA’s attention to the fact that for analogue television in South Africa, System I is the nationally adopted standard, and submits that all references to other television standards, particularly System B, should be deleted from the Official List.

2.3 The NAB notes that there are no standards pertaining to digital terrestrial mobile television broadcasting appearing in the list and wishes to query this omission, given that such transmissions could commence in the near future.

2.4 Conclusion

The NAB would like to thank the ICASA for the opportunity to make these submissions. The NAB is available to clarify or augment any of the submissions made herein.