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Dr Paul Haupt
Managing Director
SAARF

14 March 2002

Dear Paul

RE: NAB PARTICIPATION IN SAARF HEARINGS

Thank you for your invitation to the National Association of Broadcasters (NAB) to participate in the forthcoming SAARF hearings.

With regard to the broadcasting industry's input to the hearings, the NAB would like to make the following points:

- We welcome SAARF's decision to hold the hearings. We believe SAARF's willingness to open itself up to public scrutiny is a positive move which will hopefully assist in strengthening the credibility of SAARF among its stakeholders.
- We believe the results of the hearings should be fed into government's process on the transformation of the advertising industry. We encourage SAARF to participate fully in this government process.
- We believe that all facets of our industry, including research, have been tainted by South Africa's history of racism. We believe that a significant, concerted effort is required to eliminate prejudice and discrimination which still exists within our industry.

- We note that SAARF's recent decision to remove race from AMPS, RAMS and TAMS is premised on the need to "move forward in a decisive way and rid our industry of the vestiges of the past". While we support this motivation we wish to caution that the mere acknowledgement of race does not necessarily lead to discriminatory practices. In fact, as South Africa transforms itself, it is often necessary to measure race in order to establish which communities, disadvantaged by apartheid, require the assistance of government programmes. In broadcasting, this plays itself out through the processes of the Independent Communications Authority of South Africa ("ICASA") which in its consideration of licence awards, amendments and renewals considers the race demographics of the audiences being served by particular stations and channels. The removal of this demographic may make it more difficult for ICASA to measure the transformation it is achieving in the broadcasting industry and we recommend that SAARF consult with ICASA and relevant government departments on this matter.
- By way of further example, we would also like to bring to your attention the Media Development and Diversity Agency (MDDA) Bill which was considered by parliament in early March 2002. This bill allows for the creation of the MDDA to promote development and diversity in South African media. The bill recognises "special groups" and states that projects benefiting such groups should be prioritised for support. These groups include "people historically disadvantaged as a result of apartheid". With the absence of data on race, the work of the agency in rolling out support in the interests of these special groups, may be made more difficult. Again, we recommend that SAARF discuss this matter with the relevant government department.
- We also wish to note that the issues of racism and transformation go beyond segmentation tools used and also extend to such matters as representation in the staffing, management and board of SAARF, SAARF's procurement policies and the empowerment credentials of its contractors. On these issues, we encourage SAARF to set clear transformation targets for its staffing, management and board and to develop appropriate procurement policies and empowerment criteria for its contractors.
- A final issue of concern is that some smaller sectors of our industry serving predominantly black audiences, such as community radio, may feel that SAARF

does not spend adequate resources on researching their media. We encourage SAARF to increase its liaison and communication with this sector.

- We wish to thank you for the opportunity to make these written comments. The NAB does not require the opportunity to make an oral submission. Should you require any further information, please do not hesitate to contact us.

We wish you all the best for the hearings.

Yours sincerely

DR IHRON RENSBURG
CHAIRPERSON