

**SBS SUBMISSION TO
AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY (ACMA)
FIVE-YEAR SPECTRUM OUTLOOK 2021–26 WORK PROGRAM
CONSULTATION DRAFT
April 2021**

Key points

Digital terrestrial television

- Access to reliable and high-quality reception of SBS free-to-air (**FTA**) services will continue to be an essential requirement for SBS audiences who utilise the digital terrestrial television (**DTT**) platform.
- Approximately 97% of the Australian population is reached by DTT transmissions; while the remainder (3–4%) receive SBS services from the Viewer Access Satellite Television (**VAST**) platform.
- SBS is actively participating in the *Media Reform Green Paper* (the **Green Paper**) consultation process, and the development of policy outcomes, which will determine future DTT settings.

Digital radio

- There is an opportunity to provide material improvements to digital radio coverage in the Brisbane market.
- A revised scope for the Queensland digital radio channel plan (**DRCP**) consultation should be issued by the ACMA, based on the findings and feedback from previous consultations—to optimise coverage in this major metropolitan market.

Technology trials

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

I. 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) 2021–26 work program—Consultation draft* (the **Consultation Draft**). SBS continues to appreciate and value the ACMA's ongoing consultation with the industry.

Terrestrial broadcasting remains an essential service to the Australian population. For the foreseeable future, delivering services via terrestrial broadcasting utilising the broadcast services spectrum bands (**BSB**) will remain a top priority for SBS and the industry. Given the geographic enormity of the Australian continent, and the demographic distribution of its



population, in the currently evolving delivery environment¹, terrestrial broadcasting remains a vital part of SBS's multi-platform service approach, and the most efficient content delivery mechanism for mass audiences.

II. 600 MHz (617–698 MHz) and Media Reform Green Paper

The Consultation Draft notes that,

[c]urrent television channel arrangements include spectrum both inside and outside of the 600 MHz band and would require a further restack (sometimes referred to as a 'second digital dividend') to yield a contiguous block of spectrum in the 600 MHz range. The sixth channel is currently available for trials of more advanced digital television technology.²

The future management of this frequency block, currently used for terrestrial television broadcasting, is awaiting the policy outcomes of the Green Paper process, which is noted in the Consultation Draft as being at the 'initial investigation' planning stage.³ The Green Paper process in relation to this band should continue to inform the FYSO process.⁴

Access to reliable and high-quality reception of SBS's FTA services will continue to be an essential requirement for SBS audiences using the DTT platform. Safeguards would also need to be put in place to account for any further restack (noting that any such activity would be subject to significant policy development work, possibly arising from the Green Paper process, and important decisions to ensure service continuity for audiences).

The 600 MHz band forms a core component of the ultra-high frequency (**UHF**) BSB spectrum (520–694 MHz) underpinning delivery of SBS's digital television 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. Any future changes to this band must not cause disruption or interference to reception of SBS services by audiences, of which the majority rely on this spectrum band for their DTT services.

International experience in the 600MHz band reallocation and interference

Although the United States and some other nearby administrations (notably Canada and Mexico) have adopted their band plans for 5G reallocation in this 600 MHz block⁵, as noted in the Consultation Draft⁶, there is, as yet, no agreed defined spectrum reallocation for a 600 MHz band to wireless broadband (**WBB**)/mobile broadband (**MBB**) services at a global level or in the Asia-Pacific Region. The Consultation Draft makes reference to developments in the United States of 5G deployment in the 600 MHz Band (Frequency Division Duplex paired blocks), following spectrum release on conclusion of an incentive auction process.^{7,8}

¹ Which, for example, includes delivery via direct-to-home/VAST, internet protocol (IP) streaming and hybrid fibre-coaxial (HFC)

² Consultation Draft, page 29

³ FYSO – page 22: Table 1

⁴ Consultation Draft, 'Media reform green paper developments will inform the initial investigation and scoping of options for possible domestic replanning of the band', page 22

⁵ Downlink: 617–652 MHz (comprised of 7×5 MHz segments), 'Duplex', or mid-band, gap: 652–663 MHz, and uplink: 663–698 MHz (with 7×5 MHz paired segments)

⁶ Consultation Draft, page 29

⁷ Frequency Division Duplex (FDD) in paired blocks in the United States: downlink (base station) 617–652 MHz; 652–663 MHz duplex gap; and uplink (handset) 663–698 MHz

⁸ FYSO – page 29



T-Mobile is reporting wide-area coverage across the United States through its 600 MHz deployment of base stations⁹, while the 600 MHz infrastructure is also being deployed by other major telecommunications carriers in the United States (for example, by AT&T and Verizon).

As yet, SBS has been unable to ascertain the extent or materiality of potential interference to DTT reception in lower-adjacent spectrum arising from 600 MHz 5G base station deployment in the US. However, the greater provision of cable/satellite services and 'must-carry' provisions¹⁰ mean that off-air reception is at a much lower level of audience share¹¹ in the United States than it is in Australia. In the event of a Government decision to reallocate some UHF BSB spectrum below the current upper limit of 694 MHz (currently allocated as UHF television channel 51) for telecommunications use, further research to assess the extent of interference impacts will be essential, including for the development of mitigation strategies. This should be undertaken prior to determining reallocation for re-use of released spectrum.

Ongoing International engagement

SBS supports the ACMA's commitment to the broad suite of international engagements,¹² particularly in the context of maintaining security of broadcast delivery platforms. This includes contribution networks (for example, satellite links and earth stations for long-haul connectivity) for content ingest as well as traditional distribution and delivery from playout (data) centres to the end-listeners/viewers.

III. Digital radio – variations to the DRCP for Brisbane

The Consultation Draft notes that activities planned for 2021–22 include that the ACMA will 'further consult on whether variations to the DRCP for Brisbane are appropriate to improve digital coverage'.¹³

A significant audience benefit can be gained from variation to the DRCP for Brisbane. This would extend coverage into areas that no longer require co-channel protection following the cessation of analogue television and the spectrum restack, as cited by SBS in previous consultation processes.^{14,15} The ACMA should refresh the Brisbane DRCP consultation scope to incorporate the further amendments as sought by the current digital audio broadcasting (**DAB**) stakeholders and the commercial radio licensees in the adjacent markets.

The refreshed consultation on the Brisbane DRCP should be included in the list of 2021–22 project priorities for 'optimising established planning frameworks' at Table 3, and to the list of consultation plans at Table 8 of the Consultation Draft.¹⁶

⁹ <https://www.t-mobile.com/news/admin/uploads/2020/06/5G-Fact-Sheet-Original-File.pdf>

¹⁰ Must-carry rules, first instituted by the Federal Communications Commission (FCC) in 1965, require cable systems to carry local broadcast television stations. These rules were originally designed to protect the local stations, which were competing with cable networks for a limited number of cable channels, from losing market shares.

¹¹ Ofcom / IHS Markit / Broadcasters Audience Research Board (BARB)

¹² Consultation Draft, 'The ACMA will continue to monitor international developments in this band and engage with industry and government on the technology and spectrum transition path for terrestrial digital television', page 30

¹³ Consultation Draft, page 47

¹⁴ Proposed digital radio channel plan for the Gold Coast – consultation 29/2020

https://www.sbs.com.au/aboutus/sites/sbs.com.au/aboutus/files/65_sbs_submission_proposed_drpc_for_the_gold_coast_2020_final.pdf

¹⁵ Proposed digital radio channel plan for the Northern Territory and proposal to vary the digital radio channel plans for NSW/ACT, Queensland and Tasmania - Consultation paper, dated December 2016

https://www.sbs.com.au/aboutus/sites/sbs.com.au/aboutus/files/2_sbs_submission_-_acma_digital_radio_consultation_nt_nsw_act_qld_tas_-_february_2017.final.pdf

¹⁶ FYSO – pages 44 and 67 respectively



IV. New technology trials

The Consultation Draft notes in relation to broadcasting services, that 'In recognition of the technological evolution occurring in broadcasting, [the ACMA has] actively supported new technology trials, such as the DVB-T2 trials for television'.¹⁷

SBS appreciates the ACMA's open support of and commitment to industry-driven initiatives and trials of new broadcasting and delivery technologies. The effective evolution of broadcast technologies will be an integral consideration in future policy processes, including those flagged in the Green Paper.

V. Conclusion

SBS acknowledges the ACMA's ongoing commitment to consultation with SBS and the industry on its work program and looks forward to future opportunities for input and collaboration on relevant topics.

¹⁷ Consultation Draft, page 13