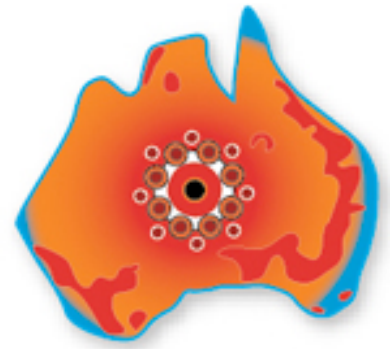


INDIGENOUS REMOTE COMMUNICATIONS ASSOCIATION

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30th July 2012

Manager
Digital Policy Section
Australian Communications and Media Authority
PO Box Q500
Queen Victoria Building
NSW 1230

To the Manager:

Re: Determination of simulcast period end date—remote television licence areas

IRCA is writing in response to the ACMA's request for comment on its proposal to determine 25 June 2013 as the end date for the simulcast period in remote television licence areas in Western Australia and 10 December 2013 as the end date for the simulcast period in remote television licence areas in central and eastern Australia.

IRCA represents the interest of the remote Indigenous media and broadcasting sector - in particular the eight remote Indigenous media organisations (RIMOs) which support 150+ remote Indigenous broadcasting service (RIBS) and self-help retransmission sites distributed throughout remote WA, NT, Queensland (including Torres Strait) and SA.

Of the regions outlined in the consultation paper, RIBS communities are active in Remote and Regional Western Australia (RWA) TV1, Western Zone TV1 and Remote Central and Eastern Australia (RCEA) TV2.

These RIBS sites currently re-transmit a range of commercial and National television services as well as National Indigenous TV (NITV), with many switching to receive the Indigenous Community TV (ICTV) service as a weekend service via the WA Government's Westlink service. 79 RIBS sites are also licensed to broadcast community produced content via community broadcasting.

IRCA would like clarification as to how the proposed switch-off dates relate to analog self-help and RIBS retransmission of satellite delivered services. Self-help or Aurora satellite services are not mentioned in the consultation paper. To date, we have understood from DST that almost all television services would continue on Aurora to enable self-help retransmission up to 31st December 2013. This consultation paper seems to suggest otherwise.

If the dates outlined also apply to RIBS and self-help retransmission services, then it is critical that the timetable considers the following program schedules to ensure households in remote Indigenous communities are not left without television services. These are:

- Completion of rollout of the Satellite Subsidy Scheme (SSS) and Household Assistance Scheme (HAS) in WA, NT and the Torres Strait Islands;
- Startup dates for NITV on VAST (beginning of September) and Switch-off from Aurora (currently planned for end of March);
- Startup of the new full-time Indigenous Community Television (ICTV) to VAST satellite (tentatively planned for November 2012); cessation of ICTV service on Westlink (currently planned to continue until 1st February 2013);
- Install timeframe for any communities opting to upgrade to digital terrestrial transmission;
- Confirmation of maintenance programs for DTH equipment in remote Indigenous communities.



Australian Government

Department of Broadband,
Communications and the Digital Economy

IRCA is a peak body supporting remote Indigenous media and communications.

Satellite Subsidy Scheme (SSS) Household Assistance Scheme (HAS) Rollout of Direct-to Home (DTH) Satellite Equipment:

IRCA is keen to ensure that any switch-off of analog services, including Aurora satellite services, is timed to integrate with the completion of DTH rollout and testing to ensure that no community is left without the full contingent of television services. As such, we wish to have assurance that all Direct-to-Home services within each region will be installed and operational prior to any switch-off of analog retransmission services.

Virtually all RIBS communities in WA and NT (except possibly Warburton in WA) have indicated their intention to opt in to the Satellite Subsidy Scheme. They will be converted to DTH delivery of VAST satellite television services within the next year and a half.

We understand that for Remote WA the SSS/ HAS opt-in letters will go out in September with final opt in around 24 December. We are concerned that with the large number of communities in WA, and the down time due to the hot summer months and wet season, that installs may not be completed by June 25th. Additionally, technical personnel in WA will be limited due to the mining boom and rollouts underway in Perth and other parts of Australia at the same time.

For NT, the initial opt in letters will go out in September but final opt in may be as late as June 2013. The rollout may not be completed until late 2013.

IRCA urges that Aurora services are not switched off until all DTH services are installed and operational in RWA and RCEA. Further, self-help analog terrestrial licenses should be continued until the SSS installs are completed or homes in RIBS communities will lose FTA TV.

IRCA notes that the 14 TSI RIBS communities are not included in this consultation paper, nor in SSS / HAS rollout plans issued to date by DST. The timetable for rollout of DTH services to Torres Strait will also impact on the end date for analog transmission of services via Aurora. These communities are keen to get details of the future of their self-help facilities, conversion to digital, and the date for switch –off of analog terrestrial TV.

National Indigenous TV (NITV)

147 remote communities across WA, NT, SA, Queensland and Torres Strait Islands had a RIBS TV analog transmitter installed in about 2006 to enable broadcast of community TV services and the ICTV service. With NITV taking over the ICTV channel 31 in 2007, this transmitter primarily broadcasts the NITV service.

NITV are currently transitioning to the new arrangement as an SBS digital channel (planned for early September?). Following recent consideration by SBS of ceasing the NITV Aurora service from end of June 2012, IRCA raised concerns about communities not being able to access the service. A rollout of VAST set-top boxes and satellite LNB upgrades was costed but in the end DBCDE opted to maintain NITV as a simulcast on Aurora until at least March 2013. This will still leave some communities without the service for up to 8 months.

New Indigenous Community TV (ICTV) full-time service on VAST

The recent announcement of a dedicated full-time channel for ICTV on the VAST digital satellite is also a key factor. Imparja TV will manage the playout and uplink. ICTV are tentatively planning to begin the full-time ICTV service on VAST from November 2012.

Currently ICTV is being delivered via the WA Government's Westlink service on the Aurora satellite. In over 60 communities, a switcher has been installed on the RIBS TV channel to switch from NITV to receive the weekend ICTV service via the Westlink service.

Westlink are planning to relocate to the VAST platform and cease the Aurora service on 1st February 2013. As much of the ICTV audience is in remote WA and NT who will not yet have DTH, ICTV are planning to maintain the weekend service on Westlink until that time.

However, there is still a significant lag time between switch-off of both ICTV and NITV Aurora services and rollout of DTH equipment. It is crucial that ICTV and NITV services can continue to be re-broadcast in communities until all DTH facilities are installed and operational.

IRCA has proposed that a dedicated set-top box be rolled out in those RIBS communities not yet upgraded to DTH to ensure ongoing access to the NITV / ICTV service. This could be coordinated as part of a VAST Radio set-top box rollout to reduce installation and travel costs (IRCA recently gathered data on all RIBS radio services for DBCDE for this project).

Another factor here is the relatively high cost of the UEC VAST Se-top Box, which is currently the only one endorsed by Optus (\$279). IRCA hopes that competition in this market will reduce the cost of these rollouts.

Communities Opting to Upgrade to Digital Transmission

At this time, IRCA is only aware of one community which is considering upgrading to digital terrestrial transmission. Warburton community in WA has applied to ACMA for a digital terrestrial VAST retransmission license. ACMA will need to advise on this application so that adequate time is allowed for Warburton to establish its digital transmission facility before 25th June 2013. This also applies to any other communities that choose this option.

IRCA is exploring options for continuation of Indigenous community broadcasting beyond 31 December 2013. Many RIBS communities have expressed interest in maintaining at least a single digital television broadcast service beyond end of 2013 to enable broadcast of local Indigenous community content with the ICTV service as a bed program. This would also provide a redundancy service to those households where satellite reception equipment fails.

DTH Maintenance Issues

Current planning by DST is that the maintenance of DTH equipment is to become a household expense after rollout. With the high risk of satellite equipment failure and very high cost of getting technical services undertaken in remote areas, it is likely that households will not be able to afford to maintain equipment and will be left without television services.

The recent Stevens Review recommended that the government cover the maintenance costs for all DTH equipment in remote Indigenous communities. As yet Minister Conroy has not formally responded to the Stevens Review and efforts to get Shires or local government to take on this responsibility have been unsuccessful. IRCA urges that the planning for maintenance of DTH equipment be finalized prior to switching off of analog services.

Summary:

In RCEA the date of 10th December 2013 seems reasonable, given that it is only a few weeks prior to the final analog switch-off date of 31st December 2013. However, we urge that this date only be implemented if all SSS/ HAS installs have been completed in NT and Torres Strait Islands.

IRCA has concerns about the RWA switch-off date of 25th June. This date may well be premature for the reasons outlined above.

IRCA is mostly concerned that there be coordination between the rollout of digital TV services and the switch-off of Aurora / RIBS analog services to ensure that communities are not left without TV services, particularly indigenous channels which are the primary services.

IRCA is also concerned that communities are given clear communication around the switch-off dates.

IRCA and the RIMO radio networks can play a role in communication to RIBS communities about rollout and switch-off dates. IRCA can also assist in providing feedback to government from communities about the status of these various programs.

We look forward to your consideration of this submission and a more flexible approach to the switch-off dates for analog services in remote Indigenous communities.

Yours Sincerely



Daniel Featherstone
General Manager
Indigenous Remote Communications Association