



## SBS SUBMISSION

### Inquiry into Broadcasting Legislation Amendment (Digital Dividend and Other Measures) Bill 2010

8 March 2011

Thank you for providing SBS with the opportunity to provide a submission to this inquiry into the Broadcasting Legislation Amendment (Digital Dividend and Other Measures) Bill 2010

SBS, as Australia's multilingual and multicultural national public broadcaster, is a highly valued media service, particularly for culturally and linguistically diverse communities. SBS's principal function is to provide multilingual and multicultural radio and television services that inform, educate and entertain all Australians, and, in doing so, reflect and promote Australia's multicultural society. SBS currently provides two national television services: SBS ONE – in analogue and digital (SD and HD); and SBS TWO – SBS's digital (SD) multi-channel.

SBS is generally satisfied with the provisions in the Bill which are aimed at improving the spectrum planning functions and powers of the ACMA to plan and facilitate the relocation of broadcasters out of the digital dividend spectrum.

SBS considers that all free-to-air television broadcasting services – commercial and national – should be available to all households in an area from the same platform, either terrestrial or satellite. Clauses 47 and 52 give the commercial and national broadcasters the option to seek an exemption from digital transmission requirements in certain situations where there is a deficit of terrestrial digital television services in an area. However, if the intention is to ensure that viewers are not required to purchase both terrestrial and satellite digital reception equipment in order to receive all the relevant services in their area, SBS believes it should be “one in all in” (terrestrially), or “one out all out” (satellite access).

SBS notes further that when making a determination for exemption from digital terrestrial transmission requirements, the Minister must be satisfied the relevant services are provided by satellite, or that there is another way in which people in the area can or will be able to view an adequate and comprehensive range of commercial and national television broadcasting services (clauses 9A(3)(c) and 21A(3)(c)). SBS would be concerned if this led to a situation where it was considered appropriate that viewers could only access services via, for example, the NBN, which might be affected by their capacity to pay. Universality of access is one of the fundamental objectives of national broadcasting.

The re-stack process will need to be carefully managed to minimise costs and disruption to viewers, and is dependent on a number of variables including technical and engineering issues, and resources. SBS considers it appropriate that provision has been made for the Minister to have some discretion to set a date later than 31 December 2014 as the designated re-stack day for an area given the challenges ahead and SBS's desire to minimise disruption of services to viewers during the re-stack process.

SBS would be pleased to brief the Committee should the opportunity arise.

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