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COMPANY:

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THE CHAIRMAN,
THE TECHNICAL COMMITTEE ON THE INDEFENDENT MEDIZ COMMISSION
AND THE INDEPENDENT TELECOMMUNICATIONS AUTHORITY,
MULTI-PARTY NEGOTIATION PROCESS,
WORLD TRADE CENTRE,
KEMPTON PARK.

16 JULY 1993 Dear Sir,

RE: ALLOCATION OF MICROWAVE FREQUENCIES FOR TV

We are in receipt of the fourth working draft of the Independent Broadcasting Authority Bill.

We are aware that the deadline for the making of submissions has passed, but we would be grateful if you would consider this

submission as we only obtained a copy of the Bill yesterday.

As major producers of television productions for broadcast and an applicant for a broadcasting licence we wish to place the following views regarding signal distribution on record:

- : 15 The Independent Broadcasting Authority only should control all microwave frequencies in Southern Africa.
- 2 A minimum of six additional microwave frequencies, over and above those already allocated to the SABC, M $\tilde{}$ Net and Bop TV, should be made available to independent producers, facility houses and broadcasters like The

Camera Store, Telemedia, Magus Vision and ourselves.

Yours faithfu :

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ARTHUR ABRAHAM

 $\ensuremath{\text{cc:}}$  Mike Markovitz - Media and Broadcasting Consultants

Wend Wendland - Webber Wentzel

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g~ TELEMEDIA (PTY.) LTD.

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Your Ref.:

QOur Ref.: PFB/mJjc/B1898

Date:

15 July 1993 Fax No 397-2281

Technical Committee on the Independent Media Commission and Independent Telecommunications Authority

Dear Sirs

Our company is engaged in the supply, installation and service of radio and television broadcasting equipment and, in particular, the provision of microwave links, repeaters and transmitters for radio and television broadcasting. Our principal customers are, of course, the South African Broadcasting Corporation, M-Net and various governments of cur surrounding countries since they are the people who invariably have license to operate such equipment.

We have recently found an increasing need in the private sector for the provision of point-to-point microwave link facilities for video events such as beard meetings, educational conferences and race meetings. We have been approached by several companies requesting that we make available on a hire basis such microwave link facilities to provide a teleconferencing service between two points. Unfortunately, we are unable te provide such a service since we do not have a licensed frequency on which to operate microwave equipment. Moreover, such point-to-point microwave links still appear to be considered by Telkom SA as being a broadcast facility and are limited 40 the two ccompanies, namely M^Net and SABC, who have broadcast licences and, therefore, contrel an unfair monopoly.

We have corresponded with Telkom in 1982 and 1883 concerning our interest in providing the local television industry with portable microwave link hire facilities and nur subsequent correspondence, up to and including, our letters in 1988 and 1989. On each of these occasions Telkom has indicated that the type of service we intend to operate is being considered tantamount to a broadcasting service and this coupled with the shortage of suitable frequencies has prevented them to accede to our reguest. We must stress once again that it is not our intention to broadcast, neither is it our intention to compete with broadcasters in any way. It is simply that we are a commercial company and can see & requirement for such a service preovided favourable consideration can be given towards licensing it.

## TELEMEDIA

We currently hire out, operate and maintain portable microwave links on an exclussive contract to M-Net and this contract, unfortunately, forbids us to use equipment or their frequencies for anything other than M-Net productions. Our current stock of microwave transmission equipment which is used for M-Net and extensively throughout Bophuthatswana to feed the horse racing TABâ\200\231s consist of some 28 llinks which are currently underutilised, Telemedia has high rize office accommodation in NDurban, Cape Town, Pretoria and Johannesburg ideally suited and strategically chosen for repeater sites fer mobile links for business conferencing and direct news injestion to the broadecasters. Tt is our ultimate aim to interconnect these premises by means of wideband lines, either at 34 Mbit digital level or analegue wideband bearers suitable for direct injection of video with audio subcarriers.

With regard to Lhe privatisation of radico and broadcasting in general, it is  $Telemediaa \ 200\ 231s$  aim to be able to offer an outside

broadcast link service to any and all of the proposed broadcasters, including  $M^{-}$ Net and SABC,

It is for this reason that we are formally requesting:

a. Two or three SHF frequencies suitable for portable microwave link equipment. (Ideally in the band 15 GHz or in the band 2,3-2,7 GHz or 3,3-3,7 GHz or 5,5-6,0 GIz or ever 12,86-15 GHz.)

Formal permission to book and pay directly to Telkom for the use of protection bearers throughecut the country for regional coniribution for broadcasters oxr video conferences.

Twe wideband radio 1link frequencies suitable for radio broadcasting links with the 15 KHz bandwidth. i.e. Two frequencies in the 240-260 MHz or 850-950 MHz band with 200 Kiiz of RF bandwidth.

As vou are no decubt aware, the frequency band between 2,300-2,500 MHz was allocated some time ago to SABC for MMDS transmission. We have supplied the first MMDS transmitters for experimental service to SABC and M-Net and we would, of course, be most anxious to secure one or two of these frequencies for our own use for multipoint distribution of video conferencing or private point o multi-point transmission., We see a market in the areas of live horse racing fed to the betting shops (TABâ\200\231s) and church broadcasts, where one host church is the originator of sound and vigion and several satellite churches have the service displayed an large screen video projectors.

Our concern is that the SABC still appear to be monopolising

their right to the use of all transmission freguencies to the detriment of private industry.

## FROM TELEMEDIA PTY LTD 3333437 P.@3

## TELEMEDIA [u

Telemedia would, of course, be very interested in the pecssibility of being able to install MMDS type transmitters in the principal centres for the relaying of such private microwave feeds without the additional cost and "red tape $a\200\235$  associated with operating

through the SABC, or Sentech {Pty) Ltd, as they now call themselves.

This represents the twenty +third application for television

microwave link frequencies that we have made to Telkom department since 1982.

Our business is in the provision of technical facilities for broadcasters and major corporate clients requiring television link facilities from one boardroom to another,

We enclose several testinonials from prospective clients, including SABC, M-Net and Telkom, in the hope that this will add credibility to our requirement.

We look forward to your favourable response.

Yours faithfully

Director

c.c, Mr Mike Markovitz : Fax No 333-3437