

SUBMISSION TO SENATE INQUIRY INTO THE BROADCASTING LEGISLATION  
AMENDMENT (DIGITAL TELEVISION SWITCH-OVER) BILL 2008

**FROM IMPARJA TELEVISION PTY/LTD**

**October 2008**

Imparja understands that a bill was introduced in the Senate on 24 September 2008 that formalises 31 December 2013 as the final switch-over date for digital television services and introduces a mechanism to allow staggered, region-by-region switchover. The senate have invited public comments on the bill.

Imparja wishes to draw to the attention off the Senate the fact that currently there is no agreed plan, process or timetable for the introduction of digital commercial TV services to the remote central and eastern Australia (TV1) licence area (RC&E) and therefore consideration of the dates and processes for analogue switch off for this market could be regarded as premature,

The major barriers to an agreed implementation are:-

- The processes which the Department of Broadband, Communications and the Digital Economy (the Department) are using for the “start-up” of digital commercial broadcasting in RC&E are based on legislation enacted in 1998. This is presaged on the need to simply provide, in digital format, single channel “analogue equivalent’ service. However in the intervening 10 years the digital television landscape has irrevocably changed. New delivery technologies have been developed and multi-channel services are seen as vital ingredients of the process by which people will be encouraged to make the transition to digital. Imparja would like to see consideration being given to the use of these new technologies as enabling mechanisms to allow viewers in remote areas to gain access to the same suite of free to air services as are (or soon will be) available to the rest of the country.

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- The digital start up plans for RC&E apply only to the 28 or so broadcaster owned transmitter locations. Most of transmitters in Remote Central and Eastern zones are self help (i.e. owned and operated by the local community). Many of these are in remote indigenous communities. Geographically they represent over 60% of the Australian land-mass. Indeed it is this numerical predominance of self help over broadcaster provided services that differentiates the remote licence areas from the rest of Australia. The need to devise an equitable and workable technical and commercial conversion scheme for self helps is one of the factors that has so far prevented the introduction of digital TV services to remote areas
- RC&E relies on satellite DTH delivery to reach up to 25% of the audience. Whereas metro and regional broadcasters were provided with capacity at no cost to allow them to operate “simulcast” analogue and digital services, the remote area broadcasters would have to purchase dual feed satellite capacity from the satellite operators. This places an inequitable burden on the remote area broadcasters who already face the dual problems of a small and geographically scattered audience, and inordinate costs of operating transmitters across an area larger than Western Europe.
- The satellite delivery system is not defined or prescribed by the broadcasting regulators; rather it must be agreed on and implemented by the broadcasters themselves. Unfortunately, due to their differing commercial and technical requirements there is currently no agreement between the various parties as to the specifications of a new “digital capable” satellite platform.

While the timing and processes delineating the switch off of analogue services in RC&E is welcomed, Imparja cannot but suggest that planning for switch-over in remote area this may be premature; considering that there is no agreed process by which the replacement digital services are to commence. We believe that it is vital, given the extremely short timetable to analogue switch-over, that the implementation of digital broadcasting in RC&E should occur in the light of the need to reach full digital take up in less than 4 years from digital start-up, and that this is most unlikely to be achieved in an environment where commercial digital services simply duplicate the analogue ones.

The satellite delivery paradigm for digital services will have a profound effect on the solution of the self help conversion, as well as on the availability (or otherwise) of multi-channel services, which will – in turn – seriously impact on the ability of remote area broadcasters to achieve digital switchover by the intended date.

These issues are not just technical. The costs and processes of conversion of self help locations fall completely outside the legislated conversion scheme, as do the costs of providing dual feed satellite delivery. Current discussions with the Department have elicited no proposals for meeting these costs.

As part of its social commitment, Imparja developed the community TV channel ICTV which was the forerunner of the National Indigenous Television, (NITV) that delivers indigenous programs, education, health and community information, and indigenous sport, for re-broadcast via analogue transmitters in over 120 remote communities. Imparja also delivers 8 indigenous community radio channels, originating from locations across Australia to re-broadcast sites as well as being available to all DTH satellite viewers.

The introduction of digital broadcasting in remote areas has tremendous potential for the inclusion of such services in a digital TV multiplex. In order to deliver the full benefits of digital broadcasting some modification to the start-up model that applied to capital city and regional market may be needed, due to the very different commercial and social paradigm of remote areas.

It would appear to us that possibly the switch-over budget itself might be applied to these currently un-funded provisions, since in the absence of a workable scheme for converting self help locations, digital take-up in RC&E cannot hope to meet a level that would allow analogue switch off to occur. What is more the valued and valuable NITV broadcasts will all fall by the wayside.

Finally it must be pointed out that most of the self help sites operate in the frequency bands between 65 and 69. Parts of these bands are intended to be cleared by the time of digital switchover, with the intention of making them available for the possible delivery of internet and communications type services.

Ironically one of the potential uses for these frequencies is for the implementation of the government's national broadband strategy in remote areas. The delay in achieving digital switch-over in remote areas therefore has the potential to directly affect the timely delivery of broadband services in these locations.

Details of Imparja's position on a holistic integrated scheme for the provision of digital services to remote areas may be referenced in our August 2007 response to the (then) department of Communications Information Technology and the Arts' June 2007 discussion paper

*"Digital conversion of self-help television retransmission sites"*

We would greatly appreciate the opportunity to present our views directly to the committee should this be necessary.

Yours sincerely,

**Alistair Feehan**

Chief Executive Officer

Imparja Television Pty Ltd

## APPENDIX

### Imparja Television Over-view

#### **Imparja Television**

Imparja Television is one of the two remote commercial satellite delivered TV channels which jointly service the Remote Central and Eastern (TV1) licence area. The licence area covers 6 states and territories, comprising 5 time-zones with an overall area of some 4.5 million Sq Km (an area greater than Western Europe). Imparja is the only remote commercial TV service which is still completely based within its licence area. At our new state-of-the-art digital broadcast facility based in Alice Springs we employ over 50 broadcast professionals (with a strong aboriginal component). Imparja's satellite signal is re-broadcast via local TV "repeaters" in over 250 towns and communities in its broadcast areas. In the more remote locations, (homesteads, stations, mining camps, ranger stations & motels for example) which are out of range of conventional TV coverage, viewers own their own satellite dish and decoder and receive Imparja direct from the satellite.

Imparja is proudly 100% aboriginal owned and is the only independent commercial broadcaster in Australia. It's shareholders have never taken any dividend from the station's operations, preferring to plough back all revenues into indigenous initiatives.

As part of its social commitment, Imparja developed the community TV channel ICTV which was the forerunner of National Indigenous Television, (NITV); that delivers indigenous programs, education, health and community information, and indigenous sport, for re-broadcast by the participating communities. Imparja also delivers 8 indigenous community radio channels, originating from locations across Australia. CAAMA (Alice Springs), TEABBA (Darwin), 5NPY (Umuwa), PAW (Yuendumu), PAKAM (Broome) PHICOM (Port Hedland), MULBA (Tom Price) and 2 CUZ (Bourke) are all distributed to re-broadcast sites as well as being available to all DTH satellite viewers.