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Infocomm Development Authority of Singapore
10 Pasir Panjang Road
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Singapore 117438

Attn: Ms Aileen Chia
Deputy Director General (Telecoms & Post)

Dear Sirs,

**RE: PUBLIC CONSULTATION ON PROPOSED AMENDMENTS TO THE
TELECOMMUNICATIONS (RADIO-COMMUNICATION) REGULATIONS**

We refer to the above caption and are pleased to submit our views for the consideration of the Info-Communications Development Authority of Singapore.

Yours faithfully

Joe Igoo
Chief Technology Officer
MediaCorp Pte Ltd

**PROPOSED AMENDMENTS TO THE TELECOMMUNICATIONS (RADIO-
COMMUNICATION) REGULATIONS**

**Issued on
18 December 2014**

MediaCorp's response to IDA consultation

Administrative Cost Pricing

MediaCorp welcomes the opportunity to respond to IDA's consultation, PROPOSED AMENDMENTS TO THE TELECOMMUNICATIONS (RADIO-COMMUNICATION) REGULATIONS, issued on 18 December 2014.

MediaCorp agrees that frequency spectrum is a scarce resource and there is a need to promote more efficient allocation and optimal use of spectrum. We also agree that there is a need to differentiate between exclusive and shared use of spectrum as mentioned in Paragraph 9b.

However, MediaCorp submits that Free-To-Air (FTA) broadcast terrestrial services should not be categorized as exclusive usage as in Table 1.2. Although the FTA broadcast terrestrial services uses frequencies exclusively, the services are enjoyed by millions of residents in Singapore for free on a concurrent basis. This is unlike the other "exclusive usage", which the services are either one-to-one or kept within a small group.

We would also add and remind that FTA TV/FM terrestrial broadcasters have other national duties, including informing the public during emergency.

For the foregoing reasons, we submit that these should not be grouped with other "real" exclusive users and the AFM fee should reflect the value of the free services that are brought to the public.

Administrative Incentive Pricing

While we are supportive of IDA's intention to reduce the hoarding of such spectrum and promote the efficient use of congested spectrum and that IDA will consult the industry separately when the spectrum bands for AIP application are identified as in Paragraph 15, we would strongly submit and suggest that IDA not apply AIP to FTA broadcast terrestrial services.

This is for the following reasons:

- The broadcast spectrums are governed by international agreement and frequency coordination with neighbouring countries. Broadcasters have participated and assisted the regulators in frequency coordination that leads to minimizing potential interference as well as efficient use of frequency spectrum.
- Broadcasters have always been proactive in exploring newer technology to deliver higher quality programmes (to benefit public) as well as for efficient use of frequency spectrum. The Digital Migration (from analogue TV to digital TV) is a good example. DVB-T2 technology enables broadcasters to provide higher quality of services to consumers:
 - MPEG4 encoding to achieve higher picture quality TV programmes (HDTV) with lower bitrate, i.e. less frequency spectrum
 - SFN (single frequency network, i.e. less frequency spectrum) technology that allows the use of multiple transmitters to achieve better coverage
 - indoor and mobile reception are now possible

This will eventually lead to the release of broadcast spectrum in 700MHz for Telecommunication services. Thus the hoarding of frequency spectrum does not arise.

- Broadcasters are unable to exploit more efficient technologies without significant intervention from Government and regulators. Unlike Pay-TV, FTA broadcasters do not have a retail relationship with viewers. Therefore, FTA broadcasters are unable to control consumers' receiver upgrade decisions. There will always be an issue of legacy receivers that are not compatible with newer technologies.
- The digital migration does not stop with HDTV. Newer technologies such as Interactive TV, UHDTV and 3DTV are emerging or under development. Any increase in frequency spectrum fee would mean less resources to develop and introduce newer services that will benefit public at large.
- MediaCorp mission is to engage, entertain and enrich audiences. To achieve the mission, MediaCorp has to broadcast programmes in all four official languages (majority of which are PSB programmes) to reach out to citizens in all classes. Any increase in frequency spectrum fee would inevitably lead to less resources available for quality programmes.